



February 20, 2019

Re: Section 889 of the FY19 National Defense Authorization Act

To Whom It May Concern,

I am submitting comments on behalf of Selcom, a Veteran owned Alabama-based company I founded in 1952, regarding **Section 889** of the FY19 National Defense Authorization Act (NDAA). I am also requesting clarification about how and if security integration companies like mine are required to change our business practices based on the law.

Defending employees, customers, students, properties and assets is what we do at Selcom. Our intrusion/burglary detection, video surveillance, access control/electronic door and fire alarm systems use non-proprietary technology, which saves our customers in Alabama money on maintenance costs without long-term contracts and high monthly fees.

As it stands, a broad implementation of the Section 889 would mean I could no longer service my government contracts using products not covered by the prohibition while simultaneously using covered products for any other commercial job. Because we do business with Hikvision, that interpretation would be devastating to my business. Any rule based on Section 889 should limit the harm inflicted to U.S. businesses and ensure ease of compliance.

Selcom has partnered with Hikvision since 2014, conducting nearly \$150k of business with them annually. Using Hikvision products allows us to offer our clients the security infrastructure they need to keep their assets safe at a reasonable price point.

If the U.S. government intends to restrict how and with whom I do business, I would like to at least have clarity on what I need to do to make sure my business is compliant. Under the provision, some of my customers could be barred from entering a federal contract because they have covered products installed in their facility to protect their property and staff. Forcing these customers to remove covered products in such a scenario, would cause significant disruption to their business.

I have also read about the Federal Acquisition Supply Chain Security Act and consider it a much more balanced approach and better alternative to Section 889 because it would offer a standards-based approach to supply chain security. Please consider this option as you develop these regulations. Will this new law augment the NDAA or replace section 889 of the NDAA?

Sincerely,

Allen Williams
Owner, Selcom
1605 West Highland Ave
Selma, Al 36701