

To Whom It May Concern:

Once the most pervasive and iconic form of communication in America, landlines don't get a lot of love these days. With so many alternatives, consumers, corporations, and regulators alike have been quick to conclude that landlines are superfluous and that they are no longer needed. I can't stress enough how mistaken this viewpoint is. Longtime industry insiders and telephony experts alike agree that our copper telephone network must be preserved in its legacy state without modification.

The United States used to have THE BEST telephone network in the world. Uncle Sam ruined it for everyone when he raped Ma Bell and broke her up in the early 1980s, and since then, the quality and standard of telecommunications in the United States has fallen from being the envy of the world to on par with those of most other countries. Still, the PSTN is the most reliable communications network available to the public.

The corporations that run the network, however, want to change that. Despite their claims, landlines – including payphones, believe it or not – are still profitable, and rake in billions per year for telecommunications companies. They are, however, no longer the main revenue source for most telecommunications corporations, who have diversified their sources beyond analog phone service to Internet service, TV service, and Voice-over-Internet-Protocol phone service. If the telecom companies got it their way, many would abandon their landline customers and force them to migrate to wireless or VoIP options. Anyone who knows the first thing about telephony knows this is a bad idea.

The copper PSTN, as simple and old as it is, is more reliable and more accessible than any wireless or Internet-based phone network that exists. With an uptime of 99.999%, landline customers are guaranteed dial tone for all but five minutes each year. No Internet provider can guarantee that Quality of Service. Emergency responders cannot emphasize enough how essential landlines are in an emergency. Call centers with E911 can get a landline user's exact location, even if they are unable to speak, instantly. Cell phone GPS geolocation is improving, but it cannot and will not ever be as accurate as landline information. Likewise, VoIP location information is not always accurate or present because of lack of regulation.

Speaking of emergencies, power outages are not uncommon. It's no secret the American power grid is vulnerable to extensive outages, and bad weather can cause outages any old day. The Northeast Blackout of 1965 brought normal life to a grinding halt, as New York City was plunged into darkness. Yet, people were able to keep in touch with each other using their telephones. Landlines are powered completely by the telephone line and are not affected by mains power outages, some often overlooked in assessing emergency preparedness. If a similar blackout were to happen today, now that VoIP and wireless services have made a serious dent in landline usage, we would be less connected than we were more than 50 years ago. Yes, most cell towers have backup power for 6 to 8 hours, but that's only part of the story. Cordless phones and cellular phones need to supply their own power, and VoIP phones must be powered by on-premises electricity. Most consumer backup power supplies do not last over a day. Furthermore, it isn't feasible to provide backup power to hundreds of cell towers in a disaster or massive power outage. On top of all the infrastructure that would be needed, it's unnecessary, as people don't need to be posting to Facebook in a power outage or liking cat photos – really, it can wait! People *do* need to be able to communicate – whether to friends and family or first responders –, which is why landlines play a vital role. A traditional landline central office can keep all the telephones in a city (not behind a PBX, which would need its own power supply) running without issue indefinitely – for weeks, even months – should mains power connectivity be disrupted. The secret is the common battery that landlines rely on. Landline central offices have extensive equipment that can be used to centrally power most telephones in a city. If

we go to VoIP and cellular almost exclusively, then we would be taking a step back more than 100 years in time, before even magneto telephones, to when subscribers needed to supply their own talk and ring power. Electricity is more ubiquitous than it was back then, but in a disaster or power outage, anyone without a landline will be left hanging. Indeed, in the recent Northeast Blackout of 2003, Verizon reported that usage of landlines surged 300% while those with VoIP and cellular phones were left in the dark. In Superstorm Sandy, those without a landline joined lines blocks long to use conventional payphones.

Next, there's call quality. Dropped calls on a landline? Garbled language? We've come a long way since the first long-distance circuits in the early 1900s, and those problems simply don't exist for end-to-end landline calls. The same cannot be said for wireless calls made using cell phones, or for calls made using VoIP. VoIP can be almost as good, but it cannot and will not ever reach quite the same standard in call quality. Why force people to move to a network that is inferior in quality? What good is "upgrading" if that means call quality gets downgraded?

Next, there's the robust nature of the PSTN and the versatility of it. Rotary phones, dial-up modems, pacemakers, fax machines, and alarm systems, just to name a few, are all supported without question on landlines. The same can definitely NOT be said for VoIP and wireless lines. Who still uses rotary phones? True, not many people, though I personally prefer the ease of dial phones to touchtone phones, which I tend to misdial. But if someone wants to use a rotary phone, they have the right to do so. Heck, I can still plug in a modem and dial into a BBS on someone's computer. The Bell System was dedicated to compatibility and making sure all new technology worked with all the old technology. VoIP and wireless providers are not interested in maintaining compatibility for legacy services. There's no reason to arbitrarily end support for features or services that aren't being used by more than 90% of people. And fax machines are still very prominent, and are not likely to go out the door anytime soon, due to their usefulness for legal paperwork and their efficiency. Restaurants with fax machines get numerous orders per day on their fax machines, no joke.

Wireless and VoIP are portable, while landlines are not. Portable is not necessarily better though. Cellular phones and landline phones serve different purposes – landlines are tied to a place, whereas mobile phones tend to be tied to people. Not everyone prefers their phone be tied to them personally – some prefer it be tied to a place. Cell phones were never designed to replace landlines, just like laptops were not designed to replace desktops. Laptops lessen the need for desktops, but they do not eliminate the need for desktops.

Furthermore, more and more people are becoming disillusioned by the effects that mobile and wireless technology is having on society. Social effects, physiological effects, physiological effects... and speaking of physiological effects, there are tens of thousands of studies proving that cellular and cordless phones can cause brain cancer and other undesirable negative health implications. People who are electrohypersensitive cannot use cell phones, and neither can anyone who holistically cares about their health. Ending landline service would cut off millions who are disabled, low-income, or health-conscious, and that would simply be unacceptable.

The only thing that wireless and VoIP have going for them is cost, which is all that service providers really care about these days. Minimizing cost is great, but is it more important than reliability, accessibility, versatility, and quality? It depends on who you ask. AT&T, Verizon, and other telecom providers who never fail to petition the FCC for deregulation will argue that yes, cost is more important. If you ask consumers, on the other hand, the vast majority who have a landline are willing to pay for a more reliable, accessible, versatile, quality connection. They see no reason to take a technological step

backwards, all in the name of cost. It's simple common sense: better things cost more. VoIP and wireless are cheap for good reason – they don't require a lot of infrastructure and they're not very good.

Cost is another consideration. Apart from the connection fee each month – which is often cheaper for landlines than for many cellular plans these days – analog phones themselves last longer. Most *Western Electric* telephones from the Bell System days are still in excellent working condition. I use telephones that are more than 60, 70, 80 years old on a regular basis, and most of us who do use old telephones experience almost no problems with them. Modern landline phones, likely made overseas, will not even half as long, but they will still last much longer than any VoIP or cellular phones. Consumers are replacing \$600 iPhones every three years, but an 80-year landline that costs \$35 on eBay will work flawlessly for another 80 years. Not everyone has been hypnotized by tech firms into buying these superfluous devices on a regular cadence. There are still a lot of people who want a decent-quality phone that won't break down and will last. Indeed, most old landline phones have outlived their original owners, and will most likely outlive their current owners. A 15-year old cell phone is considering “ancient”, but a 15-year old landline has hardly been used. For those looking for the most economical way to stay connected, landlines are clearly the best option.

It is not We, the People of the United States, asking for VoIP technology, but Them, the Self-Interested Shareholders and Executives of Telecommunications Corporations that no longer even *pretend* to genuinely care about their customers. America wants to move into the 21st century, which is understandable. But that doesn't mean gutting stuff just because it's old. That is not a legitimate excuse. There is no reason to replace something that works and is technologically superior in terms of reliability, uptime, and quality. America learned a valuable lesson in the 1980s in the aftermath of Divestiture – it learned that monopoly is NOT necessarily bad. It is time that America learn another lesson now – that old is NOT necessarily bad. The fact that the copper telephone network has survived largely unchanged for almost 150 years is a testament to its robust nature, not a reason to rip it out. Uncle Sam already made the mistake of raping Ma Bell in the 1980s, and now he wants to finish what he started nearly half a century ago – dismantling and utterly destroying more than 100 years of genuine American progress. We no longer have the world's “best” telephone system, thanks to Sam. But we do still have a good one. Let's keep it around. POTS (plain old telephone service) may be plain and old and simple, but it's also reliable, affordable, high-quality, and versatile. Consumers don't care how old a network is if it's still better. VoIP is newer and cheaper, but it's a sorry excuse for phone service. There's nothing inferior about POTS in an age when most consumer goods last half as long as they did 40 years ago. There's nothing inferior about a reliable, versatile, accessible, high-quality network. There *is* something inferior, however, about the mentality of gutting our nationwide telephone network simply because there are newer alternatives to it. Perhaps those in power should learn that “alternative” is not a synonym for “replacement” and that progress for the sake of progress always has disastrous consequences.

Yours Respectfully,

Naveen Albert