

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:)	
)	
Ensuring Customer Premises Equipment Backup Power for Continuity of Communications)	PS Docket No. 14-174
)	
Technology Transitions)	GN Docket No. 13-5
)	
Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers)	RM-11358
)	
Special Access for Price Cap Local Exchange Carriers)	WC Docket No. 05-25
)	
AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services)	RM-10593
)	
)	

To The Commission:

Comments of Nickolaus E. Leggett, Telephone Customer and Certified Electronics Technician

I am a certified electronics technician, and an Extra Class amateur radio operator (call sign N3NL). I hold an FCC General Radiotelephone Operator License with a Ship Radar Endorsement. I am an inventor holding three U.S. Patents. My latest patent is a wireless bus for digital devices and computers (U.S. Patent # 6,771,935). I have a Master of Arts degree in

Political Science from the Johns Hopkins University. My studies included public administration, constitutional law and judicial behavior, and American political parties.

I am one of the original petitioners for the establishment of the Low Power FM (LPFM) radio broadcasting service (RM-9208 July 7, 1997 subsequently included in MM Docket 99-25). I am also one of the petitioners in the docket to establish a low power radio service on the AM broadcast band (RM-11287). I have filed a total of over 200 formal comments with the FCC over the years since the 1970s. I have filed comments with other Federal agencies as well including the USPTO, FAA, FERC, EPA, and the TSA.

Electric Power for Residential 911 Emergency Calls

The traditional copper-based telephone system provides functioning service even during long-duration emergencies such as hurricanes. This is because the traditional telephone system provides its own electrical power source. This means that the user can place an emergency call whenever he or she needs to, assuming the wires are still up. This robust communications is a result of the excellent engineering employed in the design of the historical “Ma Bell” system.

Many technologists consider the “Ma Bell” system to be one of mankind’s finest constructions, and that its abandonment to be a great loss for all. However, this issue has gone much too far to be reversed at this late date.

The Current Approach

The new digital vendors of telephone service to the home provide a rather short-lived battery that the consumer must purchase. This is a poor substitute for the ongoing power provided by the copper-based telephone system.

How does a customer place a 911 emergency call when his battery has already expired? Not every emergency is wrapped up in less than a day. The elitists will answer: “Use your

cellphone”. This does not cover situations where the cell phone system is unavailable due to the volume of emergency traffic and/or when the cell phone system infrastructure has been disabled by the emergency.

The Commission should consider that some emergencies last for a long time. The telephone user at home must have the capability to call 911 throughout the duration of the emergency.

Proposed Regulation

The Commission should require that each organization supplying telephone service to the home provide an emergency power support that is at least equivalent to that provided by the traditional copper-based telephone system. This support would allow the consumer to call 911 when he or she needs emergency service.

It would be the direct responsibility of the vendor to provide this robust emergency calling service and the basic continuity of telephone communications from American homes.

Advanced Studies

The Commission should also study the potential impact of especially long-duration emergencies on the telephone service. This should include the expected impacts of large earthquakes, especially large hurricanes, solar geomagnetic storms, and electromagnetic pulse (EMP) events.

Respectfully submitted,

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