



July 10, 2015

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ensuring Customer Premises Equipment Backup Power for Continuity of Communications, PS Docket No. 14-174; Technology Transitions, GN Docket No. 13-5

Dear Ms. Dortch:

On July 8, 2015, Harold Feld, Senior Vice President; Meredith Rose, Staff Attorney; and Edyael Casaperalta, Internet Rights Fellow of Public Knowledge met with Admiral David G. Simpson, Lisa M. Fowlkes, and Nicole McGinnis of the Public Safety and Homeland Security Bureau.

Consumers must not be asked to be the sole bearers of the substantial costs associated with providing critical backup power as carriers transition away from self-powered copper. Moreover, these consumers must be given the opportunity to self-provision and stockpile power in the event of an emergency. Forcing consumers to rely upon proprietary batteries that can only be replaced or recharged by the carrier itself creates a substantial public safety threat. By comparison, commercially available power sources, such as D-cell batteries, are widely available and can be stored indefinitely in proper conditions.

Current opt-in rates for proprietary CPE power solutions cannot be used as reliable predictors of real consumer need. Hurricane Sandy illustrated in striking detail that consumers grossly underestimate the need for backup power until they are left without it. Public safety dictates that backup power options be universally available, and structured in such a way that consumers may prepare and stockpile commercially available sources of power.

The trend toward deregulation on the state level has increased the importance of the FCC in informing consumers about the tech transition broadly, and power issues specifically. Although the FCC cannot be physically present in every state, the commission should consider identifying areas that are at high risk of losing service during the technology transitions. The FCC should collaborate with local advocates in

these areas to ensure that the challenges they encounter as telephone providers change technology are recorded, and can be resolved.

In accordance with Section 1.1206(b) of the Commission's rules, this letter is being filed with your office. If you have any further questions, please contact me at (202) 861-0020x108.

Respectfully submitted,

/s/ Meredith Rose
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cc: Admiral David G. Simpson
Lisa M. Fowlkes
Nicole McGinnis