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I appreciate the opportunity to comment on this topic, even though the comment period has passed.

The FCC has emphasized the need for VoIP telephones to continue to operate during a power outage. To that end they have levied numerous requirements on service providers regarding making available backup power arrangements for customers who desire them.

While I applaud the FCC's concern in this area, I believe that the FCC has missed the largest target of this problem. This is because the end user can establish any number of backup solutions for their equipment, and many already do so; however, if any intermediate electronics serving that customer premises equipment fails due to loss of power and exhaustion of backup batteries, the effort and expense by the customer is for naught.

In the recent FCC Report and Order (Document No. 15-05, released 7 August 2015), I cannot find any FCC Rules requiring service providers to ensure that their intermediate electronics points have planning and provisioning for long-term backup. This is a significant oversight. I recognize that service providers will have to spend extra money to provide and plan for long-term backup of these intermediate facilities; however, without them it is useless to require them to do anything regarding backup of customer premises equipment.

Since the comment period is closed on this topic, this note may make no difference; however, the ideas here still need to be considered and acted upon.

Thank you again for the opportunity to comment.

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