

Dear FCC,

My name is Leif Westerlind and I live in Worcester, MA.

The principles of user choice and control are vitally important for a vibrant wireless ecosystem. But as written, the NPRM threatens to undermine these ideals by limiting what users can do with their devices. That's a concern, because router makers are notorious for releasing broken software, which is inefficient and insecure.

The draft rules could enable device manufacturers to forbid third-party software, which would kill the innovation, security, flexibility, and dynamic operation of powerful technology on cheap hardware.

Small businesses could pay under \$200 for a very powerful consumer grade device, which has much broken software and partially functioning features which make the hardware worthless. They would then have to buy much higher end, business or ISP grade hardware for a cost of several thousand dollars, and hire someone to manage it for them, and house it properly in a rack space with environmental controls, etc. Innovation and technology require the freedom to act and respond to changes in real time, not at the speed of some other business who decides it's not profitable for them to make your device work at it's full potential. This is extremely wasteful of these cheap but otherwise powerful pieces of hardware.

The economic and environmental impact of enacting this legislation of "mandated stupidity and wastefulness", that effectively turns consumer grade networking devices into disposable commodities is mind boggling. Have you ever worked in a semiconductor manufacturing facility? I have. Have you ever seen how many highly refined chemicals are used? Acids, metals, polymers, all of which take energy to manufacture and more energy to safely dispose of. And then there's the power consumption, highly precise and mind bogglingly complex tooling, lasers, X-Rays, Deep UV light, etc. There's also the human cost of technicians and operators, both employment and looking after their health from the effects of exposure to these chemicals. And there's transportation and distribution, sales and marketing, customer support.

When you open this up to free software, these devices have a lifespan of usefulness that extends from weeks or months, to years or often more than a decade of functional service. This also frees up the company from having to invest as much in consumer level customer support, because free software communities are by and large self supporting. And if support is required by a consumer, they are generally much more educated and knowledgeable about the device as a direct result of having to manage the free software themselves.

And also, if the motivation is to prevent these devices from interfering with of bandwidth ranges, then look for another way to achieve that result. You pick on the free software community because we have no single central corporate identity with highly paid lawyers to fight you. We're an easy target, and you're a bully. Go pick on someone who can fight back, like the hardware manufacturers. Require their hardware to not allow these frequencies to be generated in the first place (acknowledging that you may be hindering innovation). Require them to release 100% standards compliant, functioning devices, such that open source software isn't needed. Or even better, require them to implement free software and maintain transparency.

If a person or organization, on their own premises, either far removed from possible interference with anyone, by distance or by structure, chooses to run a non-standard frequency, has a specific need to do so, then they should be allowed to do whatever they damn well please. Their property. Their hardware. Not interfering with anyone. NOT ANY OF YOUR GOD DAMNED BUSINESS. The Constitution gives us the right to "pursue happiness", and if this is our expression of that idea, to utilize technology as power users or as small businesses, to improvise, adapt, innovate, to

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do more with less, to create value for society in some way, to enjoy the benefits of our hard work and time invested, to learn to do things better and smarter, then it is your job as our Federal Government to RESPECT THE WISHES OF THE PEOPLE and GRANT US OUR PURSUITS.

But seeing as you are ever the ignorant fools, I have no delusion that you will yet again reinforce the notion that we must make freedom illegal in the USA in order to protect the corporations and increase the range and scope of the violations upon which you generate revenue from fines and other penalties. You will only push the public deeper underground. Devices will be reverse engineered. All your regulations and restrictions will be bypassed. And people will vehemently deny and defy in response, creating more problems than currently exist, and create a scenario that is impossible to enforce practically. You people never learn, that you do not control the world, and you do not control technology anymore. If you want people to go along with rules, enact intelligent rules, fair rules.

Sincerely,

Leif Westerlund