Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the matter of

Comments - NBP Public Notice #25	)	GN Docket Nos.
	)	09-47, 09-51 and
	)	09-137

As the Commission considers rulemaking to follow the progress in telephone technology from circuit-switched to packed-switched, one essential feature must be retained in order to assure equal access and the preservation of public safety that Americans have grown to rely on from the public switched telephone system.

Ever since the progression from local-battery telephones on rural circuits in the 19th and early 20th century to common-battery circuits served by automatic central offices, the telephone carrier has assumed responsibility for the function of the telephone service from end to end, including power for the subscriber’s device. Advanced services have often required local powering and other arrangements to be made, but the basic service was guaranteed. This aspect of telephone service must not be lost.

It is understood that telephone service based on a voice over internet or other broadband protocol requires a far more complex device than was the case for nearly a hundred years of dial telephone service. But the function for the subscriber need not be any more complex unless advanced services are desired. It is possible, and the Commission should require, that basic service be available to subscribers without requiring them to provide power for their basic telephone instrument. There are unique challenges if, for instance, service is provided over a fiber optic link -- but the Commission must not permit a shift of responsibility for basic services away from the carrier and on to the subscriber. While it may be simple for some to provide the necessary equipment and provisioning, many subscribers are unable to do so and should not be cut off from basic telephone service.

Respectfully submitted,

David L. Josephson
Santa Cruz, California