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Office of the Secretary
Federal Communications Commission
445 12th Street SW - Room TW-A325
Washington, DC 20554

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Attn: Carmell Weathers
Competition Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW - Room 5-C140
Washington, DC 20554

Comments on WC Docket No. 12-371; Comp. Pol. File No. 1074

I, Robert F. Gonsett, president of Communications General Corporation ("CGC"), am a consulting radio engineer and have been in practice before the FCC in broadcast radiofrequency engineering matters for over 40 years. I have been a subscriber to low-speed (56 kbps) dial-up Internet services provided by Connectnet for many years -- starting well before Connectnet was acquired or controlled by XO Communications, LLC ("XO"). Apparently Connectnet is involved in the dial-up disconnect request filed by XO; however, curiously, the name "Connectnet" is not included in XO's filings and I have never received a formal notification of discontinuance of service as will be discussed below. My Connectnet address is <cgc@cgc333.connectnet.com>.

At one time, Connectnet dial-up was my only means of Internet access. Today, most of our office work is performed on a high-speed AT&T Internet circuit. However, Connectnet dial-up service is maintained (a) to format and distribute my once-a-week newsletter, the CGC Communicator, which has been in continuous publication for over 40 years, and (b) to serve as an emergency backup for periods when high-speed Internet service is disrupted. The newsletter is non-commercial and is e-mailed free of charge to over 1,000 subscribers nationwide -- but only to those who request it.

There are a number of internal hardware and software issues that make switching ISPs difficult on short order. Moreover, our Connectnet account is not a typical account. We have access to Connectnet's "newsletter server" which disseminates the newsletter to a large number of addresses in one shot. Were we to send the newsletter via our AT&T high-speed computer over AT&T channels, for example, we could only send to 30-50 addresses at a time as I recall. (AT&T apparently does this to prevent its subscribers from becoming large-scale spammers.)

As a matter of record, I never received a notice by U.S. Mail that Connectnet's dial-up service would be discontinued, nor a formal notice by e-mail of same. It was on December 3, 2012 (UTC), while corresponding with Connectnet on an unrelated problem, that their agent stated the following at the end of the e-mail: "Another ISP will be needed sometime after the first of the year when our dial up is discontinued." That remark set off alarm bells. When pressed for details, on December 5, 2012 the Connectnet support team said, "Our administrators have let us know that it will be disabled sometime in the first quarter of 2013," and on December 31, 2012, after being further pressed, the team said, "...At this point we have not received a firm date yet. However I have informally heard that our admins plan to discontinue the product on 1/21/13. Please make the necessary plans as soon as possible...." Please note the fact that on December 7, 2012, XO's application to discontinue "selected dial-up services...to a limited number of customers" was filed with the FCC; however, on December 31, 2012, more than three weeks later, Connectnet's support team claimed "we have not received a firm date yet."

At no time did Connectnet indicate to me that discontinuing dial-up would involve an FCC proceeding or that public comments would be invited. I came across the FCC's "Comments Invited" Public Notice by accident two days ago while scanning the Daily Digests for broadcast-related matters. If other Connectnet customers were treated the same way, the vast majority will miss the narrow window available to file written comments.

I have every reason to move away from Connectnet at the earliest possible opportunity. For months, some ISPs have blocked all e-mails coming from Connectnet. As a result, I have lost a number of newsletter subscribers (all hotmail and MSN accounts have been blocked for example) and I've expressed concern to Connectnet a number of times. On the other hand, there is a need to stay connected to Connectnet until I can make the necessary hardware and

software upgrades to modernize our equipment and transition to another ISP. A number of our corporate and government subscribers filter their incoming e-mails and have white-listed our current address <cgc@cgc333.connectnet.com> in order to receive the newsletter. Put simply, I need to (a) continue to use my current Connectnet address -- which passes through subscribers' spam filters -- to tell the subscribers that we are switching to a new address, (b) give the subscribers the new address once it is known, and (c) wait for that address to be white-listed. This is not going to be an easy process and speed bumps are expected.

For these reasons, I respectfully request that the FCC require Connectnet to maintain the dial-up service that it currently provides to me for a period of 120 days from today. This will affect only one of Connectnet's many hub stations and should not be burdensome on XO. The hub in question (reportedly located in Vista, CA) uses the following telephone numbers (although it would be sufficient if Connectnet maintained only the first two numbers -- with 0001 & 0127 suffixes -- during the 120 day period): (760) 560-0001; (760) 560-0127; (760) 666-2801; (760) 509-9900; (760) 509-1900; (760) 560-8110; (760) 666-2871.

As mentioned eariler, the CGC Communicator newsletter has been in continuous publication for over 40 years. It is now distributed by Connectnet e-mail exclusively. The CGC Communicator is relied upon by many broadcast professionals. One employee of NBC, for example, told us that he is instructed to copy the newsletter to "about 50" NBC officials each time he receives a copy. A number of FCC Enforcement Bureau field agents have told me that they study the newsletter for local and national news. The District Director of one FCC field office recently offered this unsolicited comment: "As always, thanks for the services your newsletter provides. We read it every week."

Thank you for considering these comments.

A handwritten signature in black ink that reads "Robert F. Gonsett". The signature is written in a cursive style and is underlined with a single horizontal line.

Robert F. Gonsett
President, Communications General Corp.
(760) 723-2700