

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**In the Matter of:** )  
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**Protecting and Promoting the Open** ) **GN Docket No. 14-28**  
**Internet** )  
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**To the Commission:**

**Request for an Extension of Time from Nickolaus E. Leggett,  
Licensed Radio Operator, Inventor, and Analyst**

I am a certified electronics technician (ISCET and iNARTE) and an Extra Class amateur radio operator (call sign N3NL). I hold an FCC General Radiotelephone Operator License with a Ship Radar Endorsement. I am an inventor holding three U.S. Patents. My latest patent is a wireless bus for digital devices and computers (U.S. Patent # 6,771,935). I have a Master of Arts degree in Political Science from the Johns Hopkins University. My studies included public administration, constitutional law and judicial behavior, and American political parties.

I am one of the original petitioners for the establishment of the Low Power FM (LPFM) radio broadcasting service (RM-9208 July 7, 1997 subsequently included in MM Docket 99-25). I am also one of the petitioners in the docket to establish a low power radio service on the AM broadcast band (RM-11287). I have filed a total of over 200 formal comments with the FCC over the years since the 1970s. I have filed comments with other Federal agencies as well including the USPTO, FAA, FERC, EPA, and the TSA.

### **Request for an Extension of Time**

I am requesting that the Commission seriously consider granting an extension in the comment and reply comment periods for this proceeding. I am making this request because it has become clear that the Commission's staff is not large enough to carefully read and process the flood of comments from the public in the available time. In addition, the American public takes the subject of network neutrality quite seriously, and expects that the Commission shall carefully review each public comment submitted.

### **A Large Volume of Public Comments**

At the present time, the afternoon of June 18, 2014, the Electronic Comment Filing System (ECFS) reports that 184,889 filings have been posted. This is a very large number of filings as compared to the typical number of filings in an FCC proceeding. Many of these filings are a single-page of comments, but there are also a large number of longer and more detailed comment documents.

It is realistic to expect that substantially more public comments, and reply comments, will be submitted during the course of this proceeding. This is resulting in a situation where even a large staff assigned to the proceeding would have an extremely difficult time dealing constructively with the large number of comments submitted to the Commission. A while back, the press reported that the Commission had assigned 12 staff members to read and evaluate the public comments. This is clearly inadequate to handle the actual flood of comments.

### **Processing Incoming Comments**

Our society is very hierarchical with many of the decisions being made by the top officials of large private and public organizations. The typical structure of these organizations is

the classical pyramid with a few people at the top. This type of structure has been fine for managing fairly static organizations, but it has significant problems dealing with change.

The major problem is that these hierarchical structures do not have the “data processing” power to deal with numerous inputs. For example, take a look at the American Congress. The individual Senators and Congressmen along with their small staffs do not have the mental capacity to process all the inputs they receive. It is just a matter of information science. No matter how brilliant these people are, they do not have the combined brainpower to process the flood of data inputs sent to them. They will always be running behind the flood and many inputs will necessarily be ignored.

The same problem occurs in the administrative branch of the Federal Government. For example, the Federal Communications Commission is having great difficulty dealing with the comments on network neutrality. Here again, the staff is rather bright and knowledgeable but the entire staff does not have the physical capacity to process all of the inputs they are receiving in the time available.

### **The Demand to Process the Comments**

I have examined samples of the comments. You quickly see that the comments strongly favor network neutrality principles. In addition, the comments link network neutrality closely to our basic democracy and to future opportunities to participate in society and the economy via the Internet. This is a heavy-duty issue that is very basic to society and its values. In contrast, the cell phones on airplanes issue is quite light-weight.

This means that the Commission cannot just do a simple pro-forma job of reviewing the public comments on network neutrality. The issue is just too important and basic for that. In addition, if the Commission decides to abandon or limit network neutrality aspects, it will have

to explain its actions very carefully to the public. The public cannot understand why it should be excluded from full and free participation on the Internet. The Commission would have to do a great deal of powerful explaining to go against this public expectation.

**Recommended Action**

Instead of having to rush through over more than 180,000 public comments, the Commission should slow down and do the analysis thoroughly and correctly. The Commission should abandon its current goal of completing any network neutrality regulations or policies this year. Instead, the Commission should take the time to closely evaluate all of the public comments. In addition, the Commission should hold numerous hearings and “town meetings” on network neutrality subjects. These meetings should not just be limited to “experts”, but there should also be large amounts of time for comments from the general public. Network neutrality impacts our future democracy and the basic legitimacy of our government and society. We cannot just leave this issue to the big boy industries and various elites.

**Respectfully submitted,**

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