

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of:)
Accelerating Wireline Broadband) WC Docket No. 25-208
Deployment by Removing Barriers to)
Infrastructure Investment¹) WC Docket No. 25-209
)

**COMMENTS OF WIRED BROADBAND, INC.
AND THE FILING PARTIES
ON BEHALF AMERICANS INJURED AND DISABLED
FROM ELECTROMAGNETIC RADIATION
(ELECTROMAGNETIC RADIATION SYNDROME – EMR-SYNDROME)**

Filed October 27, 2025

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FILING PARTIES

The parties listed in Appendix A (attached hereto and incorporated herein by this reference) collectively constitute the “Filing Parties,” have granted permission to submit these Comments on their behalf, and join together to submit these Comments.

¹ <https://docs.fcc.gov/public/attachments/FCC-25-37A1.pdf>.

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Introduction

Wired Broadband, Inc., and the Filing Parties set forth in **Appendix A**, respectfully submit these comments on behalf of Americans injured or disabled by electromagnetic radiation, and those who do not want to be injured or disabled by electromagnetic radiation. The Filing Parties and coalition partner groups have a reach of over two million people in over 30 states across the country. We advocate for the safe deployment of communications infrastructure.

We are in **strong opposition** to the Commission's proposed rulemaking to eliminate copper landlines. By eliminating copper landlines, the Commission would be removing the very lifeline that the Commission was created to maintain. The Commission's primary obligation since the Communications Act of 1934 has been to provide ubiquitous telecommunications service in the U.S. that is affordable with a statutory mandate "to protect life and property through the use of wire and radio communication."² Removing copper landlines would endanger the lives of Americans because there is no adequate or reliable substitute in the event of an electrical or cellular outage.

Many commenters have pointed to the inadequacy of the so-called "advanced" technologies of cellular and Internet-based connectivity that, for the commenters in this docket, has consistently failed them in emergencies. The only connectivity that saved them in emergencies was copper landlines. In addition, there are those commenters who pointed to the fact that they and others they know cannot use cellular equipment or Wi-Fi because of the adverse and debilitating biological effects of electromagnetic radiation of these "advanced" technologies.

Given that the Commission has been sued and lost in 2021 and is subject to a court remand order to address all information in its docket showing biological effects of electromagnetic radiation, of which it has actual knowledge, it should not be proceeding with this Notice.

Therefore, the Commission's actions under this Notice is in direct conflict with its statutory mandate to "protect life and property" under the Communications Act of 1934, as amended. The Commission should be redirecting all of its "expediting" and "streamlining" efforts in expediting and streamlining the review of those 11,000 pages of scientific, peer-reviewed studies which the Court has ordered the Commission to address, showing biological effects within the Commission's limits for human exposure. The Commission has no business proceeding with this Notice until it complies with the Order.

1. Notification Provisions Must Remain as a Matter of Due Process

The FCC's notification provisions under 47 CFR Section 51 to provide notice to the public must be enforced, robustly, including but not limited to: FCC Rules 51.319(c)(3)(iv), 51.325,

² Communications Act of 1934, as amended by the Telecommunications Act of 1996, 47 USC §151 *et seq.*

51.327, 51.329, 51.331, 51.333, and 51.335. This is also a matter of complying with procedural due process requirements set forth under the Fifth Amendment to the U.S. Constitution.³ The public notice requirement is part of Americans' procedural due process rights to notice and an opportunity to be heard and contest prior to any government action that will take away life, liberty or property.

Taking away copper landlines can rise to a government taking, by diminishing the value of private property which does not have reliable communication or is replaced with fixed wireless connectivity that is producing adverse biological effects to those residents within its beam or radius of radiation, in effect producing a toxic zone and causing the constructive eviction of residents from their homes. "When a government regulation so diminishes the value of private property . . . it is considered a taking, even if the government doesn't physically seize the land."⁴

We agree with AARP that the FCC should maintain, at least, the 60-day notice period to consumers, and we strongly support extending that to a 180-day notice period to allow all interested consumers to raise their issues.⁵

Based on the many comments in this docket, the Commission is already on actual notice of how Americans have been, and will continue to be, directly affected by the retirement of their copper landlines, to name a few:

- a. **Life:** inability to make an emergency call, inability to receive emergency information from local officials during a disaster, inability to use cell service because of Electromagnetic Radiation Syndrome (EMR-Syndrome), experiences where there was a cell service outage because of cell towers catching on fire, lack of Internet connectivity which interfered with an urgent call,
- b. **Liberty:** surveillance and privacy considerations
- c. **Property:** devaluation when cell towers are erected close to homes, creating a toxic EMR radiation zone compelling the public to evacuate their homes, in each instance rising to a government "taking" requiring just compensation.⁶

The list goes on. Copper landlines do not suffer from the foregoing inadequacies.

Surely, the Commission should now be in a position to acknowledge various subjects related to the impacts of wireless facilities on Americans, as brought up by many commenters in the above-referenced dockets and in 03-137, 13-84 and 19-226: property devaluation,

³ Amendment V, U.S. Constitution, "No person shall . . . be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use without just compensation."

⁴ See, e.g., <https://www.congress.gov/crs-product/R47562#:~:text=The%20Takings%20Clause%20also%20dictates,compensation%20for%20a%20particular%20taking.>

⁵ <https://www.fcc.gov/ecfs/document/10929206597247/1> at 10.

⁶ *Penn Central Transp. Co. v. New York City*, 438 U.S. 104 (S.Ct. 1978), <https://caselaw.findlaw.com/court/us-supreme-court/438/104.html>; see also, <https://constitution.findlaw.com/amendment5/annotation12.html#:~:text=The%20Fifth%20Amendm ent's%20taking%20clause,before%20it%20takes%20the%20property.>

surveillance and privacy issues, regular outages of cellular and Internet coverage, and, of course, the adverse biological effects of radiofrequency (RF) radiation which have long been established by overwhelming scientific evidence. That includes peer-reviewed scientific studies entered into the Commission’s dockets, and as covered in the 2021 D.C. Circuit Court of Appeals decision that referred to the Commission’s refusal to review those studies, as “arbitrary” and “capricious.”

These notice provisions provide Americans due process, the opportunity to object to a notice of network changes or retirement of copper wires. Unless the public is informed by notice, the public will have been deprived of the opportunity to object.

2. Copper Landline Advantages Over VoIP

Many commenters have extolled the virtues of copper landlines and for good reason. Copper landlines are:

- a. reliable, affordable, and easy to install
- b. highly secure as they provide dedicated communication lines independent of other network components
- c. higher data transfer rate than most wireless networks
- d. more easily repaired in the event of an outage.⁷
- e. work during power outages as they receive power from the phone lines themselves.⁸

In contrast, one does not need any more proof that the Internet does go down than to see the various websites that monitor when Internet outages, on a daily basis.⁹

Is there a major Internet outage today? Yes, it's likely there's at least one Internet outage today. No platform, no matter how dominant, is immune to Internet disruptions . . . The Internet, for all its vastness, is a delicate web of interdependent systems.¹⁰

In fact, there are many reported outages even for businesses.¹¹ In emergencies and in life-threatening situations, the public cannot rely on such fickle connectivity. Therefore, it is in the public interest to maintain redundancies.

⁷ <https://mixnetworks.com/what-you-should-know-about-copper-phone-lines/#:~:text=Copper%20lines%20have%20the%20benefit,the%20event%20of%20an%20outage..>

⁸ <https://www.battlbox.com/blogs/outdoors/do-landlines-work-when-the-power-is-out#:~:text=Do%20all%20landline%20phones%20work,not%20work%20during%20an%20outage.>

⁹ Downdetector <https://downdetector.com/status/new-york-state/map/>; Catchpoint <https://www.catchpoint.com/outages>; <https://www.thousandeyes.com/resources/Internet-outages-timeline>.

¹⁰ <https://www.catchpoint.com/outages>.

¹¹ Cisco’s Thousand Eyes reports on its website notable Internet outages affecting AWS 10-20-25, Microsoft Azure Front Door 10-9-25; Starlink 7-24-25; Cloudflare 7/14/25; Google Cloud 6-12-25; Spotify 4-16-25; Zoom 4-16-25; Workday 3-17-25; X 3-10-25; Slack 2-26-25; ChatGPT 1-23-25; with many other incidents reported for prior years.

Other disadvantages mentioned by commenters include many factors that affect voice quality using VoIP which do not affect copper landlines. Augmenting on their comments, factors affecting VoIP include:¹²

- a. degradation of voice quality (especially during peak times due to insufficient bandwidth)
- b. congestion caused by too many devices drawing on the same bandwidth causing voice quality degradation
- c. high latency resulting in voice delays
- d. unstable connection
- e. packet loss leading to broken or incomplete audio.

3. There is No Ubiquitous, All-IP Internet Network that Would Otherwise Make Copper Landline Discontinuance Feasible or Safe

For the sake of argument, even if a ubiquitous, all-IP Internet network were to be even feasible, where is there evidence that a ubiquitous, all-IP Internet network exists today to justify the discontinuation of copper landlines?

We agree with AARP when it states that:

“In the FCC’s assessment of the merits of relaxing regulatory oversight of ILECs, AARP urges the FCC to fully consider the consequences of such actions on the public interest.”¹³

For the sake of further argument, as AARP states, there needs to be a seamless transition, and while such transition is occurring, copper lines must remain in full service. By eliminating all copper landlines which has provided ubiquitous service in the U.S. for about a century without first ensuring that an all-IP Internet network is actually in operation risks a large portion of the U.S. to be without any means of communication. In any corporate setting, there are redundancies in place until the new system has been fully tested and is certified as fully operational.

We would go further than AARP to say that **full redundancies must remain in place**, not only during the installation of IP Internet, but thereafter. In other words, there would be no transition, but would be co-terminous with copper landlines. Despite a full transition to VoIP, there is no assurance that the Internet system that supports VoIP will remain operational 24/7 or in emergencies. Many commenters have pointed to the inadequacy of their VoIP. Even if the network core were to be fully VoIP, as many parts of it are, last mile copper lines continue to operate with a VoIP core even in the event of power outages in the last mile.

¹² <https://www.blueridge.tech/2025/01/27/addressing-poor-voice-clarity-in-voip/#:~:text=Insufficient%20Bandwidth,can%20significantly%20impact%20voice%20clarity..>

¹³ <https://www.fcc.gov/ecfs/document/10929206597247/1> at 16.

Further underscoring the need for redundancies, when the Internet does go down, the elderly and rural communities are left without connectivity especially during emergencies. If the copper landlines are eliminated, there will be no connectivity with an Internet outage. Unfortunately, there have been instances when the Internet and cellular service have gone down, with the only recourse being landlines, as was the case during the fires in Santa Rosa, CA.¹⁴

We disagree with AARP that “the transition to new, affordable technologies . . . has thus far been largely consumer-led,” as there is now a consumer-led movement to go back to copper landlines. Having been led down the “garden path,” consumers are realizing that their copper landlines were more reliable during emergencies. A number of comments state how “advanced” technologies such as cellular devices are not accessible for a large part of the population that experiences adverse biological effects from exposure to wireless devices.

While we agree with AARP that the FCC should “chart a *consumer first* roadmap,”¹⁵ that roadmap should extend to maintaining the copper landlines. We otherwise agree with AARP that:

“Expectations of future deployment of new technologies should not diminish the quality or availability of companies’ copper-based services today.”¹⁶

We agree with AARP on the point that:

Premature reliance on not-yet-deployed technologies – based on the hope that forbearance will accelerate the deployment of new technology – risks the safety of consumers. Bridges to new technology rather than chasms between technological platforms should be integral elements of any transition. Safeguards are essential until new technology has been deployed and proven to be reliable . . .¹⁷

4. Regulatory Forbearance is No Guarantee that Carriers will Invest in Communities that Need Services

AARP points out the more realistic trajectory than what other industry commenters have posited in this docket:

¹⁴ Comments of Kim Schroeder: “In 2017, cell phone networks didn't work during the major fire in our city of Santa Rosa, it was my landline call from the city that alerted me so my family knew to leave my home in the middle of the night. Copper landlines work in emergencies when power is out.”

¹⁵ <https://www.fcc.gov/ecfs/document/10929206597247/1> at 1.

¹⁶ <https://www.fcc.gov/ecfs/document/10929206597247/1> at 2.

¹⁷ <https://www.fcc.gov/ecfs/document/10929206597247/1> at 4.

AARP is not persuaded that as a result of forbearance, carriers will choose to redirect resources from abandoned legacy voice services to modernizing their networks. Instead, as is currently the case, it is more likely that carriers will build out next-generation services only where they determine that a solid business case justifies such deployment. There is no obligation for carriers to redirect resources that they may now spend to maintain legacy voice services toward deploying state-of-the-art services. Precisely those locations where consumers are most likely to rely on copper-based landlines for reliable service are also those locations that are least likely to attract private investment, regardless of the level of regulatory oversight.¹⁸

It is not readily evident that existing regulatory oversight is creating a *barrier* to network improvements. If carriers' requests to discontinue service are approved, they are under no obligation to re-allocate copper-related maintenance monies to deploy new technology. Instead, it seems more likely that, regardless of the process that the FCC ultimately adopts for reviewing requests to discontinue service, companies will continue to choose to enter local markets when a business case justifies such entry: if it is not profitable *today* to enter a particular rural market, there is no reason to expect that it will be profitable to do so *tomorrow, after regulatory relief has been granted*. For this reason, before carriers are permitted to discontinue network maintenance, there should be compelling evidence that consumers actually have access to reliable affordable alternatives.¹⁹ [Italics in original text]

5. 47 CFR §214 Should Remain Intact

Americans will be adversely affected by any discontinuance of copper landlines, as evidenced by the many comments in opposition to such discontinuance. These adverse effects are precisely what 47 CFR §214 is designed to address. The current discontinuance provisions under 47 CFR §214 should remain as it makes clear that no discontinuance can be effected unless the carrier certifies that:

neither the present nor future public convenience and necessity will be adversely affected thereby . . .²⁰ [Emphasis added]

The exception provides that the Commission may authorize a discontinuance on a temporary or emergency basis, neither of which is currently applicable.²¹

¹⁸ <https://www.fcc.gov/ecfs/document/10929206597247/1> at 15-16.

¹⁹ <https://www.fcc.gov/ecfs/document/10929206597247/1> at 7.

²⁰ <https://www.law.cornell.edu/uscode/text/47/214>.

²¹ <https://www.law.cornell.edu/uscode/text/47/214>.

One commenter stated that the Commission’s forbearance from § 214 would still make choices available for consumers,²² but our disagreement is that making choices between equally deficient voice communications that are dependent on connecting to the Internet are not workable or reliable in case of an Internet outage or an emergency when connectivity is most essential.

The same commenter posited that such forbearance would serve the public interest because funds would be freed up for “providers to devote more resources,”²³ but, there is no guarantee that carriers will decide to invest in communities that need services, rather than paying out dividends to their shareholders. AARP brings this point home:

“AARP . . . cautions that the monies that ILECs save by discontinuing the maintenance of their copper networks may not necessarily be used by the ILECs to deploy new technologies in areas that are now unserved and underserved. ILECs, which are beholden by fiduciary obligations to shareholder interests, may choose instead to simply use those unspent monies to increase shareholder dividends. That is, freeing ILECs from regulatory obligations will not necessarily translate into deployment of next generation networks in areas that are inherently unprofitable to serve.”²⁴

6. Additional Questions to Pose to Providers and Consumers

The Commission should pose additional questions of providers and consumers to obtain a realistic picture of what the Internet technologies can and cannot do, such as:

- a. If the copper landlines are eliminated, will consumers have sufficient means by which to communicate, especially in the case of emergencies? What would they be?
- b. What are the possibilities of maintaining the copper landlines especially as they already provide Internet service to remote areas? If closing the digital divide could be realized by shoring up the copper landlines rather than tearing them out that would leave consumers without any means of communication, would it make sense to keep the copper landlines? DSL over copper can reach speeds of 100 Mbps – potentially faster than the ill-conceived Commission goal of promoting satellites instead of DSL over copper.²⁵
- c. Have there been instances where the copper landlines were eliminated and replaced by wireless where consumers then received worse service?
- d. The Commission would like to hear from consumers on their preferences.
- e. How often have providers’ Internet systems gone down where consumers could not access the Internet or make a VoIP call?

²² See Fiber Broadband Association, <https://www.fcc.gov/ecfs/document/1092958501123/1at2>.

²³ Id.

²⁴ AARP, <https://www.fcc.gov/ecfs/document/10929206597247/1> at 6-7.

²⁵ <https://www.ringcentral.com/us/en/blog/what-is-dsl/>.

- f. To what extent have consumers been injured by not having access to a copper landline during Internet or cellular network outages?
- g. We would like to hear from providers on how often their cellular and Internet networks go down, and exactly what they tell their consumers as alternative means of communication, and whether they give their consumers alternative means of communication. Does the alternative communication include an alert to use their copper landlines? What will be their alternative communication method if the copper landlines are eliminated?
- h. Were there any wireless facility installations that worsened, interfered with or stopped communications connectivity.
- i. What alternatives can be put in place to provide emergency connectivity during an Internet or cellular outage?

7. What Constitutes “Reasonable Public Notice” Should Not Be Left to Industry’s Discretion

The Commission’s statutory obligation under § 251(c)(5) of the Telecommunications Act of 1996 is clear:

(5) Notice of changes

The duty to provide reasonable public notice of changes in the information necessary for the transmission and routing of services using that local exchange carrier's facilities or networks, as well as of any other changes that would affect the interoperability of those facilities and networks.

The Project Digital Institute (PDI) misunderstands this provision in asking the Commission’s forbearance.²⁶ First, Sec 251 is black letter law from which the Commission does not have the option to forbear. The Commission is required to enforce it, it is not optional; therefore, the Commission cannot forbear from its statutory responsibility.

PDI’s suggestion to eliminate the various rules that interpret the statute in terms of what is “reasonable” and have the word “reasonable” stand on its own without the FCC’s clarifying standard of what constitutes “reasonable” notice, would leave it to the discretion of every LEC. Rather, there should be consistent standards to provide certainty for the LECs and consumers which the current rules provide.

Would PDI have each LEC determine for itself what is “reasonable?” Leaving it to the LECs to determine what is “reasonable” makes a mockery of the statutory obligation. It also introduces a morass of confusion as different LECs will have different concepts of what is “reasonable.” What is reasonable for the consumer and what is reasonable for the LEC may be worlds apart and subject to litigation. If consumers cannot afford to go to court to litigate the issue, then the LECs would win by default. That is not what was intended by the statute.

²⁶ <https://www.fcc.gov/ecfs/document/1001096866143/1> at 1.

That would result in a quagmire of confusion, and self-policing. Lacking clarity as to what is “reasonable” would shift the burden on the municipality or consumer. The statute is clear and the rules should stay in place.

There is no effective alternative to replace copper landlines in emergencies. For people who live in rural, tribal or coastal communities without viable alternatives, landlines are the most reliable form of communication and are crucial in emergencies.²⁷ Landlines are also the only alternative for individuals with Electromagnetic Radiation Syndrome (EMR-Syndrome) who cannot use wireless technology, whether in emergencies or for everyday needs. In short, wireless is no substitute for copper landlines, or for wired broadband, for that matter.

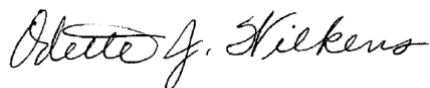
Conclusion

For the foregoing reasons, we oppose the retirement of copper landlines. And we reiterate the words of one of the commenters:

Landline infrastructure that is already in place serves a valuable function for the safety and well-being of Americans. **It is absolutely peanut-brained to let that infrastructure collapse.**²⁸ [Emphasis added]

On behalf of Americans Injured and Disabled from Electromagnetic Radiation and the Filing Parties

Respectfully Submitted,



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²⁷ “Experts Say Landlines Are Crucial In An Emergency And Are Opposing AT&T’s Request To Phase Them Out,” 3/27/04, <https://laist.com/news/landlines-emergency-request-to-phase-them-out>.

²⁸ <https://www.fcc.gov/ecfs/search/search-filings/filing/109291874701062>.

APPENDIX A

The parties listed below collectively constitute the “Filing Parties,” have granted permission to submit these Comments on their behalf, and join together to submit these Comments.

National Organizations – Filing Parties	
	The National Call for Safe Technology, Odette J. Wilkens, Chair & General Counsel
	The Weston A. Price Foundation, Sally Morell Fallon, President, Washington, D.C.

U.S. State	Filing Parties
AK - Alaska	Hal Stachman, Sitka, AK
AL - Alabama	Donald Campbell, Huntsville, AL
AR - Arkansas	PACTS International, Ken Stroud, Advisory Board Member/Technical Director, with Havana Syndrome, Little Rock, AR
AZ - Arizona	Arizonans for Safe Technology
	EMF Wellness Tucson, Lisa Smith, PhD, Tucson, AZ
	Safe Tech Tucson, Tucson, AZ
	Floris R. Freshman, published artist and composer, with EMR-Syndrome, Scottsdale, AZ Susan Molloy, M.A., Snowflake, AZ
	Melissa Hayes, M.S. with EMR-S, Oro Valley, AZ, Oak Haven Wellness, LLC
	Renée Neumann, Tucson / Green Valley, AZ Kathy Flanagan, with EMR-S, Prescott Valley, AZ Karen Carswell, Flagstaff, AZ
CA – California	EMF Safety Network, Sidnee Cox, Co-director, Windsor, CA
	Fiber First LA, Charlene Hopey, Topanga, CA
	Malibu for Safe Tech, Lonnie Gordon, Executive Director, Malibu, CA
	Napa Neighborhood for Safe Technology, Amy Martenson, Napa, CA
	Safe Tech International, Sara Aminoff, Union City, CA
	5G Free California, Julie Levine, with EMR-Syndrome, Topanga, CA,
	California Brain Tumor Association, Ellen Marks, Director, Indian Wells, CA
	Sustainability Management Consulting, Angela Casler, Chico, CA
	Eagle Forum of California, Orlean Koehle, CEO, Santa Rosa, CA
	Brenda Shafer, with EMR-Syndrome, CA Gene Wagenbreth, Topanga, CA Margaret Holt Baird, Esq., with EMR-Syndrome, San Diego, CA Raymond Michael LeVesque, RayGuardProtect.com, National Health Federation Board Member, Clear Lake Riviera, CA
CO - Colorado	Coloradans for Safe Technology, Andrea Mercier (mother of a severely disabled child who is adversely impacted various forms of non-ionizing radiation), Colorado Springs, CO

	Coloradans for Safe Technology, Nancy VanDover, DVM, OMD, Dipl Acup, disabled by EMR, CO
	La Plata for Safe Technology, Ingrid Iverson, with EMR-Syndrome, La Plata County, CO
	Longmont for Safe Technology, Doe Kelly, Co-Founder, with EMR-S, Longmont, CO
	Deborah Shisler, with EMR-S, CO Virginia Farver, Fort Collins, CO
CT - Connecticut	Connecticut for Responsible Technology, Private Membership Association (PMA), Paska Nayden, Co-Founder & Administrator, with EMR-Syndrome
FL - Florida	Kay Fitt, Palm Harbor, FL; Susan Lee, Miami, FL Shirley Denton Jackson, with EMR-Syndrome, unexpected early retirement from School District of Palm Beach County, FL - Research Project Manager and Safe Schools Coordinator - due to EMR-Syndrome, North Palm Beach, Florida
IL - Illinois	Safer Cell Phone and Wi-Fi Project, Marne Glaser, Chicago, IL
LA - Louisiana	Southern EMF Radiation Solutions, Shari Champagne, with EMR-Syndrome, Houme, LA
MA – Massachusetts	Massachusetts for Safe Technology, Cecelia Doucette, Director, Ashland, MA
	Pittsfield Cell Tower Injured & Concerned Citizens (injured with EMR-Syndrome), Pittsfield, MA
	Safer Siting 01240, Lenox, MA
	Safe Tech International, Patricia Burke, journalist, with EMR-S, Millis, MA
	Sustainable Upton, Laurie Wodin, Co-Administrator, with EMR-S,yndrome Upton, MA
	Last Tree Laws (.com), Kirstin Beatty, with EMR-Syndrome, Director, Holyoke, MA
	The Leto Foundation, Westborough, MA
	Alison McDonough, with EMR-Syndrome, Canton, MA Janet FitzGerald, M.S., CCC-SLP Rowley, MA, member of Massachusetts for Safe Technology Anna Nelson, with EMR-Syndrome, Pittsfield, MA Tais Howard, Lynn, MA
MD - Maryland	Safe Tech International, Kate Kheel, Taneytown, MD
	Katherine Katzin, Takoma Park, MD
ME - Maine	Global Union Against Radiation Deployment from Space, Bowdoinham, ME
	Maine Coalition to Stop Smart Meters, Richmond, ME
	Janet Drew, retired Registered Nurse, York, ME

	Jen Goddard, Board Certified Doctor of Natural Health, Thriving Proof Holistic Health Practice, and 2025 United States of America Mrs. Maine Pageant, Brewer, ME
MN - Minnesota	Safe Tech Minnesota, Leo Cashman, Petra Brokken, St. Paul, MN
MO - Missouri	Loraine Uebele, FACHE, Kansas City, MO Marty Freyer, Mexico, MO David B. Klug, Kansas City, MO Bethany Klug, Supporter and Advocate for EMF Affected, Kansas City, MO
NC - North Carolina	Sharon Behn, Arden, NC Susan Marlan, Asheville, NC Nicole Stallings, with EMR-Syndrome, Black Mountain, NC
NE - Nebraska	Tammy Lee, with EMR-S, Lincoln, NE Linda Becker, Lincoln, NE
NH - New Hampshire	New Hampshire for Safe Technology, Deb Hodgdon with EMR-Syndrome, Stratham, NH
NJ - New Jersey	Lisa Allen, Plainfield, NJ Diane Grossi with EMR-S, East Hanover, New Jersey
NM - New Mexico	Lori Bagley, concerned individual with EMR-Syndrome, Albuquerque, NM
NY - New York	New Yorkers 4 Wired Tech, New York, NY New York City Alliance for Safe Technology, New York, NY Safe Tech Westchester, Ruth F. Moss, Westchester, NY Amy Harlib, Concerned Citizen, New York, NY Fred P. Sinclair, Jr., Alfred, NY Kate Reese Hurd, Philmont, NY, with EMR-Syndrome Gabriela Munoz, Carmel, NY, with EMR-Syndrome Stephanie Stewart, LaGrangeville, NY Virginia Caswell, NYC (Stuyvesant Town), NY, with EMR-Syndrome
OH - Ohio	Craig McDowell, veteran, Rocky River, OH Erin McDowell, Registered Nurse, with EMR-Syndrome, Rocky River, OH, Southwestern Ohio for Responsible Technology (SWORT) Jennifer Manzler, Certified Health & Wellness Coach, Cincinnati, OH, SWORT Sean Polacik, Automation Control Systems Technician, OH Cristina Shonk, Cincinnati, OH
OR - Oregon	Oregon for Safer Technology, Ashland, OR Kelly Marcotulli with EMR-Syndrome, Ashland, OR The Soft Lights Foundation, Mark Baker, President, Beaverton, OR
PA - Pennsylvania	Pennsylvanians for Safe Technology, Donna DeSanto Ott PT DPT MS FMCHC, Founder & President, PA Southwest Pennsylvania for Safe Technology, Mount Pleasant, PA, Susan Jennings, MPA, BA, Founder (son has EMR-Syndrome) Jan Kiefer, Scottdale, PA

RI - Rhode Island	Rhode Island 4 Safe Tech, Sheila Resseger, M.A., Co-Founder, Cranston, RI
TN - Tennessee	Janet Taché, Hohenwald, TN
UT - Utah	Rosemarie Russell, member of The Women's State Legislative Council of Utah, Hurricane, UT
VA - Virginia	Virginians for Safe Technology, Jenny DeMarco, Communications Director, and Mary Bauer, retired radio frequency engineer, Fredericksburg, VA
	Charles Frohman, M.Ed, HIA, lobbyist, National Health Federation, Williamsburg, VA
	Linda M. Cifelli, retired Registered Nurse, Williamsburg, VA Grace Hilbert, with EMR-Syndrome, Annandale, VA
VT - Vermont	Martine Victor, Manchester, VT
WI - Wisconsin	Katrine Colton, with EMR-Syndrome, Sheboygan, WI
	Tracey Seymour, with EMR-Syndrome, Westfield, WI
	Carol Seibert, with EMR-Syndrome, Trevor, WI

Europe	Filers
Sweden	Eva Christina Andersson, E.U., Sweden

APPENDIX B

Here is a compendium of various commenters in 25-208 and 25-209 organized by major subject matter:

A. Copper Landlines Need for Rural Access and Emergencies; Beneficial Redundancies

See also comments from:

Cindy L. Russell, M.D., Physicians for Safe Technology, September 20, 2025²⁹

Nina Beety, October 27, 2025³⁰

Mary Poirier Gilroy³¹

First, every landline owner should have been made aware of this months ago. Living in a rural area, we have always appreciated redundancy, whether it's a wood stove for heating, or our landline for communication. Our landline is critical when electricity is off and when we can't charge our cell phones. In addition, our landline is our preferred communication device and has been for decades as it's easier to use and safer than being dependent on a cell phone. Plus, we've been paying to maintain copper landlines for years, so there is no excuse for eliminating them.

Sara Sunstein³²

To the FCC: VOTE NO on 25-208. AT&T is once again attempting to leave its Carrier of Last Resort responsibilities and eliminate copper-line landlines in CA. Not everyone has cell phones, and many of those who do have cell phones have very poor or no reception at home, especially if they live rurally. My brother in NH and a friend in rural Bay Area are in that latter group. Even those in the city who are used to cell phones have frequent interruption of their cell lines. Land lines and their reliability are essential to all of us! For some of us, it's our daily lives; others it's during emergencies and natural disasters, which you may have noticed happen more and more frequently. Last year AT&T made a similar request--and there were thousands of letters opposing such. It didn't happen. Then they tried to get the CA legislation to help them opt out of maintaining landlines. Never got out of committee. Now they're up to the same request. and the answer is the same: NO. AT&T has to maintain land-line telephone service. Protect public safety and communications. VOTE NO on 25-208. Thank you.

Loraine Uebele³³

²⁹ <https://www.fcc.gov/ecfs/document/10929283203196/1>.

³⁰ <https://www.fcc.gov/ecfs/document/10272546200635/1>.

³¹ <https://www.fcc.gov/ecfs/search/search-filings/filing/1092914224406>.

³² <https://www.fcc.gov/ecfs/search/search-filings/filing/1001922011614>.

³³ <https://www.fcc.gov/ecfs/search/search-filings/filing/10928266950004>.

Copper landlines work in emergencies when power is out. Cell phone networks didn't work in CA fire disasters but landlines did.

Sidnee Cox³⁴

Wireless networks have failed in emergencies. During the fires in Sonoma County in 2017 and 2019, we were without wireless connection for several days. We had no way to communicate! Millions of Californians depend on their copper landlines for emergency communication. Cable and fiber networks rely on modems and routers that require electrical power to work. Battery back-ups are not reliable. We need the redundancy of our copper connections. • From July 2024 to Sept. 2025, over 600 public comments were submitted to the CPUC (California Public Utility Commission) docket in support of retaining copper landlines. Here is a link to 600+ submissions from the CPUC docket for their rulemaking proceeding titled "Order Instituting Rulemaking Proceeding to Consider Changes to the Commission's Carrier of Last Resort Rules." CPUC docket: apps.cpuc.ca.gov/p/R2406012 (click on "Public Comments") • Human bodies are not "technology neutral." An increasing number of people are experiencing disabling reactions to wireless technology and must greatly limit their exposure, especially in the home. They cannot rely on cell phone communication. • Customers have been paying extra fees in their phone bill for years to maintain copper landlines. • AT&T claims customers are abandoning copper in favor of wireless. However, I have heard complaints from friends about AT&T customer service where they have been told that AT&T no longer services copper lines. Therefore, people cannot get a new copper line installed and if an existing line needs repair, they are told it may be weeks before it can be serviced. •

Susan Kopald³⁵

Copper landlines work during emergencies when power is out. I rely on the landline for my calls as reception is 100%. As a young child we could not wait to get a landline. It is unheard of to eliminate this reliable mode of communication which is safe, secure and necessary. This is short sighted and not in the public interest.

Linda Dance³⁶

Landline communication is essential for me for the following reasons: I can NOT have a cell phone for communication because the wireless technology adversely effects me. With storms, hurricanes, and other reasons for power outages - I have NO way to communicate and should an emergency arise at that time I can NOT call for help. IF I could use a cell phone, during hurricanes the cell towers are often with outages and others lose their communication so they can NOT call for help in emergency.

Susan Foster³⁷

. . . SAFETY: Copper landlines are safer and more secure. Wireless communications cannot be relied upon in emergencies, particularly when the present danger is fire.

³⁴ <https://www.fcc.gov/ecfs/search/search-filings/filing/109221952904764>.

³⁵ <https://www.fcc.gov/ecfs/search/search-filings/filing/10929215476510>.

³⁶ <https://www.fcc.gov/ecfs/search/search-filings/filing/10928261427582>.

³⁷ <https://www.fcc.gov/ecfs/document/1092981426674/1>.

Sometimes a landline phone is the ONLY form of communication a specific protected class of U.S. citizens can use. Testimony at the California Public Utilities Commission (CPUC) hearing in 2024 highlighted that removing landlines also eliminates a lifeline for hundreds of thousands of Californians who depend on landlines. Emergency response personnel also testified at the hearings, cautioning that their ability to communicate with those in need will be harmed if landline phones are eliminated. This is true for other states, as well, in emergency situations. The significant pushback against AT&T in California, with testimony suggesting profound harm will be caused by the elimination of copper landlines, is cautionary for the entire country . . . In January 2025, the Palisades Fire burned into Malibu, approaching it from the east. As the fire moved over the highest point of land directly east of Malibu where many cell towers had been positioned, the cell towers were destroyed by the rapidly advancing fire. By January 8, Malibu city officials issued urgent evacuation orders to all remaining residents as the fire remained out of control and threatened the whole of Malibu. The fire destroyed thousands of homes and structures along the Pacific Coast Highway and throughout Malibu, resulting in significant loss including fatalities . . . A large number of Malibu residents could not call 911 because the cell towers were no longer there to service their calls. I will repeat for emphasis: the people who could call 911 had landline phones. This was also true during the 2018 Woolsey Fire. It was after the Woolsey Fire in Malibu and the Paradise, California Camp Fire (2018), with substantial loss of life and inability to call 911, the CPUC created a backup plan for cell tower communication . . . However, the rapid movement of these fires driven by Santa Ana winds makes it too dangerous to get backup batteries to existing towers. . . . ACCOMMODATION OF DISABLED: Numerous people are sensitive to telecommunications technologies. Without landline phones and copper landlines to service them, millions of disabled persons would be unable to communicate with the outside world . . .

Linda Ikeda³⁸

Copper landlines represent the most advanced and best technology for clarity, cost, reliability in emergencies, and safety, especially when compared to fiber and wireless. During the California fires, landlines still worked. It provides excellent voice connectivity compared to wireless. It does not use electricity, helpful when the electric and cell towers go down. Battery back-up for modems and routers (needed for cable and fiber optic connectivity) are unreliable. The more frequent catastrophic events that have been occurring lately require a good, solid network like our copper landlines. Further, research blames numerous illnesses on wireless (see <https://manhattanneighbors.org/safety-of-wireless-technologies-the-scientific-view/>). Many health-minded people, aware of health risks from Electro-Magnetic Radiation (EMR), prefer landlines. An increasing number of people suffer from EMR Syndrome. I must limit my use of the computer, any telephone connected to electricity and wireless. I am fine if I severely limit my use. Therefore, for me, and others disabled from EMR - Syndrome, the safety of copper landlines are a necessity. . Further, the FCC should not overrule the desires of the states. In California, the CPUC, and the state legislature listened to the people in favor of copper landlines. Over a quarter of the US population uses landlines. Many more would use them except that AT&T has consistently refused to provide them. For decades customers have paid for copper-landline upkeep.

³⁸ <https://www.fcc.gov/ecfs/search/search-filings/filing/1092901533982>.

Pauline Bondonno Cross³⁹

Do not end copper land lines. They are an essential service we need in emergencies..We used our copper land line and relied on it during the SF earthquake of 1989 when other services were not available for many days including cell phone use. In fire emergencies this is critical to have land lines.

Kim Schroeder⁴⁰

My dear friend Mary Dahl in Santa Rosa CA and millions of others are 100% [reliant] on their landlines as their bodies aren't compatible with wireless technology. Mary was diagnosed by an MD as electromagnetic sensitive (ADA diagnosis) in 2023. Her landline is her only way to communicate with family, her doctors, and in emergencies. In 2017, cell phone networks didn't work during the major fire in our city of Santa Rosa, it was my landline call from the city that alerted me so my family knew to leave my home in the middle of the night. Copper landlines work in emergencies when power is out. There are cyber security risks with cell phone connections. Wired technology is much more private and secure. Customers have been paying extra fees in their phone bill for years to maintain copper landlines. The FCC should not attempt to override work undertaken by states, which have authority under federal statutes to act to protect the public health and safety of their residents.

Esther Mander⁴¹

I am very much opposed to any communications service changes in the name of “modernization” that would lead to the demise of copper landlines. This shortsighted move would handicap many rural areas in the event of natural disasters. Copper landlines work in emergencies when the power is out. Not having reliable communication during emergencies is the difference between life and death.

I live in an area of the Big Island of Hawaii where there is no cell service. I rely 100 percent on my landline. If I wanted, i could receive cell service though my wi-fi. Well, that’s all well and good until a hurricane or storm hits, which are common in my area. The power goes out, and the cell service goes out. We need reliable communications during emergencies.

Copper landlines have been reliable for a century. People may call them “antiquated,” but they remain highly functional. Should we also get rid of all combustion engine cars because they, too, are antiquated, compared to electric cars? If the thing ain’t broke, why get rid of it? Landline infrastructure that is already in place serves a valuable function for the safety and well-being of Americans. It is absolutely peanut-brained to let that infrastructure collapse.

B. Copper Landlines for Emergencies for the Elderly and Disabled

Pennsylvanians for Safe Technology⁴²

³⁹³⁹ <https://www.fcc.gov/ecfs/search/search-filings/filing/10929263170533>.

⁴⁰ <https://www.fcc.gov/ecfs/search/search-filings/filing/10929321730023>.

⁴¹ <https://www.fcc.gov/ecfs/search/search-filings/filing/109291874701062>.

⁴² <https://www.fcc.gov/ecfs/search/search-filings/filing/10929273525325>.

. . . a senior citizen who was offered “fiber” but was not told she would be giving up her copper landline by accepting the fiber. Her power went out and she went to call the power company, and her phone did not work. She also cannot use a cell phone. She, fortunately, could walk to a neighbor to use their phone. If this woman has a medical emergency and cannot walk when her power is out – how will she call for help?

Sheila Resseger⁴³

In Rhode Island, many people — including the elderly, disabled, and families with young children — depend on copper landlines and cable-based voice services during emergencies, when cell towers often fail. Providers like AT&T, Cox, and Verizon must be required to maintain dependable, non-wireless voice options. The FCC should ensure that all carriers offering phone service provide resilient, affordable, and accessible wired connections so that no community or community member is left without communication in disasters or other emergencies. In many communities, storms have repeatedly caused cell phone services to fail. These failures left families without reliable communication exactly when it was needed most. The only option that has proven to work consistently is direct hardwire copper service — not DSL modems, not cellular towers. The FCC must recognize that so-called “modern replacements” often fail in real-world emergencies, while copper has historically remained the most resilient.

Dan Stowell⁴⁴

I need my land line as we are an elderly couple who depends on it. We are not knowledgeable with the cel phones, etc. and are unable to carry them everywhere we go.

Paska Nayden⁴⁵

In Connecticut, many people — including the elderly, disabled, and families with young children — depend on copper landlines and cable-based voice services during emergencies, when cell towers and DSL often fail. Providers like AT&T, Frontier, Xfinity/Comcast, Optimum/Altice, Spectrum/Charter, Cox, and Verizon must be required to maintain dependable, non-wireless voice options. As a woman with health issues and one who does not use cellular service and who has in the past experienced DSL VOIP problems when there is a disaster, I do not want to be placed at risk. The FCC should ensure that all carriers offering phone service, whether traditional telcos or cable companies, provide resilient, affordable, and accessible wired connections so that no community is left without communication in disasters.

Erin M, RN⁴⁶

For people who are disabled, who use medical alert systems, or DSL... copper landlines work. For people who live in rural and remote areas, copper landlines work. For people with metal implants, or electronic implants, who are susceptible to known and documented adverse biological effects from wireless radiation, who need to avoid wireless connections/exposure -

⁴³ <https://www.fcc.gov/ecfs/search/search-filings/filing/10925899728253>.

⁴⁴ <https://www.fcc.gov/ecfs/search/search-filings/filing/10929045343303>.

⁴⁵ <https://www.fcc.gov/ecfs/search/search-filings/filing/10925274358648>.

⁴⁶ <https://www.fcc.gov/ecfs/search/search-filings/filing/1092898281386>.

copper landlines work. For people who suffer with EMR-S (Electromagnetic Radiation Syndrome, a.k.a. EMS Electromagnetic Sensitivity), all too familiar with the warning, "Distance is your friend" - whether from electric utility companies, or warnings on cell towers/antennas... copper landlines work. Physicians often prescribe reduction or elimination of as much EMR/EMFs (Electromagnetic Radiation, Electromagnetic Fields) as possible to treat patients with debilitating symptoms that range from insomnia, headaches, tinnitus, visual impairment, nose bleeds, brain fog, memory lapse, ADHD/behavioral problems, life-threatening conditions like Atrial Fibrillation, heart attacks, strokes, development or exacerbation of degenerative neurological conditions like autism, vertigo (loss of balance), Bell's Palsy, Guillain-Barré, MS (Multiple Sclerosis), early onset of Alzheimers, Parkinson's, brain tumors, acoustic neuromas, even other types of cancer... copper landlines, not pocket sized cell towers, provide a much safer connection! . . . All citizens must have options to safe, reliable and affordable communications, especially in emergencies of electrical power failures, network disruptions. The FCC must investigate and stop any deceptive practices deployed by corporations intent on putting profits over people, including bullying citizens into surrendering copper landlines, forcing them to affix themselves to cell phone/blue tooth connections that emit radiation, carry cyber security, surveillance and tracking risks.

Christine Borje⁴⁷

To The FCC: I'm writing to urge you to vote NO on 25-208 to ultimately allow AT&T to leave its Carrier of Last Resort (COLR) responsibilities and eliminate copperline landlines in California. This is a gross violation of the The Elder Abuse and Dependent Adult Civil Protection Act (EADACPA) in California. Removing landlines from elderly and dependent adults constitutes: – Neglect by not providing medical care via access landlines during emergencies when cell phones are down – Neglect by not protecting the elder[ly] and disabled from safety and health hazards – Abandonment of the elder and disabled – Isolation of the individual – Engagement in treatment leading to pain, mental suffering, or physical harm. If you approve the removal of landlines, you will be acting with "oppression, recklessness, malice" towards the elderly and dependent adults and will be guilty of elder and dependent adult abuse. The California Elder Abuse and Dependent Adult Civil Protection Act is one of the most powerful acts in California. If a dependent adult or elderly launches a suit for abuse and wins, they automatically are entitled to have all of their attorney fees paid and damages by the opposing side: The Elder Abuse and Dependent Adult Civil Protection Act, provides for the award of attorney's fees and costs to, and the recovery of damages by, a plaintiff when it is proven by clear and convincing evidence that the defendant is liable for physical abuse or neglect, and the defendant has also been found guilty of recklessness, oppression, fraud, or malice in the commission of that abuse. Why is this even up for a vote after over 5,000 letters poured in from around the state last year objecting to the removal of landlines and they had to extend the hearings because there were so many objections. It's OUTRAGEOUS that you would even consider putting yourself, your families, and everyone in California at great risk of death during emergencies like earthquakes, fires, and medical emergencies when the power is out. Copperline landlines are essential infrastructure, providing reliable telephone service and 911 access through most disasters and in power outages. Voice quality is high, and it provides exact

⁴⁷ <https://www.fcc.gov/ecfs/search/search-filings/filing/10930302529288>.

location data for callers -- essential in an emergency such as a heart attack, stroke, choking incident, or home invasion. In fires and for evacuation notices, landlines are the difference between life and death. Many Californians require 24/7 access to family and medical personnel due to health conditions, and no other service provides that dependability. For those disabled by electromagnetic sensitivity -- as many as one million or more Californians, according to a state public health survey -- these landlines are the safest and only telephone service they can use. Other systems are fragile and undependable. In a power outage, when the batteries die, there is no telephone service at all and no access to 911. Cell phones drop calls and often have difficult-to-understand voice quality. COLR means that everyone in AT&T's service territory gets telephone service without discrimination. There is no substitute. Without COLR, there will be a haves and have nots system, which is unacceptable and going backward in time to when only a few enjoyed telephone service. Vote NO on 25-208! This is yet another example of corporate greed and shortsightedness attempting to override public safety!

C. Batteries Fail for VoIP Systems, Cell Phones and Cell Tower Coverage; Unreliable VoIP Service; Degradation of Service with Cell Coverage

Patricia Burke⁴⁸

I worked in the office of a medical provider. Every morning the answering machine for the corded landline phone would have blank spaces from callers using a cellphone and believing that they were leaving a message. The widescale adoption of cellphones is inefficient, not secure, not reliable, not safe, and necessitates unnecessary consumption of energy, and irresponsibly adds to the e-waste stream. During weather-related outages in MA with downed trees, once the batteries died on cellphones and VOIP systems, large swaths of the community had no connectivity. The FCC and the industry created these dangerous conditions.

Statistics showing a declining trend in landline use does not take into account that contributing to that decline is the fact that carriers are no longer maintaining copper landlines, consumers being compelled to buy cell phones, and when consumers realize that they prefer their landlines and want to re-activate them, they are no longer available. Those factors would artificially accelerate the decline. This was pointed out by Julee Mertz:⁴⁹

“Copper landlines work in emergencies when power is out! Cell phone networks didn't work in CA fire disasters but landlines did! Our children who do not yet have cell phones need a reliable home phone in case of emergencies. Battery back-ups for modems and routers (needed for cable and fiber optic connections) are unreliable. AT&T claims people are abandoning landlines, but many AT&T service reps are telling customers AT&T no longer services copper and they won't install landlines anymore. People in remote or rural areas rely on copper landlines. Copper landlines work with DSL and medical alert systems. WE have been paying extra fees in their phone bill for years to maintain copper landlines.”

⁴⁸ <https://www.fcc.gov/ecfs/search/search-filings/filing/10928695419051>

⁴⁹ <https://www.fcc.gov/ecfs/search/search-filings/filing/10929033830273>.

Carol Seibert⁵⁰

. . . [T]here is a sizable segment of the population, including seniors, that either do not have a cell phone or do not want a cell phone. Plus, there is a rapidly-growing number of people, including myself (also a senior), who have a specific condition called EMR-S (electromagnetic radiation syndrome) who cannot use a cell phone because we are adversely affected by wireless radiation. . . . I live in an area of Wisconsin where the electrical power goes out frequently, which also takes down the cable power, so I am left stranded without communications even though I have a generator for power! My lights can go back on but I have NO communications. This leaves aging, vulnerable people with NO WAY to contact help in case of an emergency. What if someone has a life-threatening event such as a heart attack or stroke? What if there's a fire? How do we call for help?

Second, even without power outages disrupting telephone lines, the modem-based Internet for telephone communications is not reliable. Not AT ALL! Not being able to make or receive calls at critical times has happened to me several times. The most tragic missed call was in June 2021 when the hospital caring for my sick father tried to contact me in the middle of the night to let me know my father was struggling. But we could not establish a connection after several attempts because my Internet-based landline was having unexplained "glitches" that night. So, I was tragically denied being at my father's bedside when he died because I could not be reached due to an unreliable Internet/modem-based landline! That was a horrible travesty I will not soon forget!! How many other tragic stories are out there like mine? . . . there is always the threat of attacks on our fragile power and communication grids by unknown terror agents. (See thwarted telecom attack in NY during UNGA 9/2025). An attack on either energy or cell communications could immobilize our country causing unthinkable harm to many.

Copper landlines do not have the inherent weaknesses of wireless or Internet / modem communications system. Therefore, Copper Landlines must be restored and maintained for the health and safety of the people in our country... if not for the life of our country itself. A reliable national communications system is not optional.

<https://www.cnbc.com/2025/09/23/secret-service-dismantles-telecom-threat-around-un-capable-of-crippling-cell-service-in-nyc.html>

Rosemarie Russell⁵¹

[Her communications connectivity worsened or stopped once a cell tower was placed near her property in Utah. Prior to that tower, her community had above average cell phone connectivity (4 bars on the cell phone) from a cell tower 7 miles away. Fortunately, since she had a working copper landline, she was able to call for emergency when her husband suffered a fatal heart attack. When she asked the workers why did they place the tower close to her home, their answer was that it was cheaper to build there.]

“Cell phone reception prior to the tower being activated was four bars at our location. Since the tower was activated I do not have reception now and many residents do not have cell

⁵⁰ <https://www.fcc.gov/ecfs/search/search-filings/filing/10926117528052>.

⁵¹ <https://www.fcc.gov/ecfs/search/search-filings/filing/1092906400564>.

reception. Although the nearest cell tower was about 7 miles from our lot, because there were no obstructions to block the signal (such as mountains), or any direct reflection off the nearby cliffs, paradoxically, the service was above average compared to our current situation. Reflected radiation can cause out-of-phase signals which degrade service . . . Upon activation of service on this tower in 2013, the radiation levels increased and the quality of **cell service tanked (no bars to occasionally one bar)**. Since many of the antennae are directed at the Hurricane Cliffs that soar a thousand feet above our home, the out-of-phase issue noted above, likely contributes to the degradation of service and potentially, the re-exposure of harmful scattered radiation redirected to our residential development. I contacted the FCC regarding this matter. There was no concern or effort on the part of the FCC to measure or test the signals. Sadly, there were other locations available (more remote from residences) for the tower, and eliminating the Cliffs' reflection. However, when my husband and I questioned the employee of the cell tower company, the rationale was purely economic. It was much cheaper to build where the electrical and the road infrastructure were already present . . . My landline was working at the time my husband suffered a fatal heart attack. I was able to contact the police and emergency rescue because I had a working landline.” [Emphasis added.]

D. Copper Landlines Provide Reliable Service ; Insufficient Bandwidth for VoIP

Wendy Tico⁵²

Please continue supporting landline use. I regularly use my landline line at home and work. The voice quality and reliability of land lines are significantly better than cellphones in rural areas. At work, we often have dropped calls from patients who call our medical office. Since the office has a landline, we are able to provide a reliable phone service for patients. The presumed degradation of customer service would negatively impact all sorts of businesses where customers expect reliable connections. At home my cell phone regularly drops calls as well. My landline is steady and reliable. In rural areas it is difficult to get significant bandwidth for computer use, let alone to add VOIP. This plan may work well in cities, although even there occasional long outages are unacceptable for emergency service and other business uses. Do not drop support for landlines.

Deborah Shisler⁵³

Copper landlines are not antiquated. They are lifelines. They work in emergencies when the power goes out. It was proven during the CA fire disasters. Copper landlines worked and cell phone networks did not. AT&T claims people are dropping their landlines, however many AT&T service reps are informing their customers that AT&T no longer services copper and they will not install landlines any longer. I want and need my landline. I live in a rural area and depend on my copper landline. My body is compromised by wireless technology. I have been paying additional fees to maintain my copper landline for decades. Please allow customers to keep this vital form of communication. Thank you, Deborah D Shisler

⁵² <https://www.fcc.gov/ecfs/search/search-filings/filing/10011556208362>.

⁵³ <https://www.fcc.gov/ecfs/search/search-filings/filing/10928001764998>.

Bradford J Harding and Margaret McMorro⁵⁴

Copper landline connections that are already in place, are essential for:

- reliability during power outages and natural disasters,
- dedicated infrastructure for security,
- their role in analog fax machines used by businesses such as hospitals and medical practices.

Please preserve copper networks alongside fiber upgrades.

E. Adverse Biological Effects of Cell Phones vs. Copper Landlines

See also comments from:

Deborah Kopald, September 28, 2025⁵⁵

John S. Smolowe, M.D.⁵⁶

please keep copper land lines. cell phones don't work during electrical blackouts. i have patients who get sick with the high electromagnetic fields of cell phones

Margaret Glaser⁵⁷

On dependence on copper landlines and exposure to RF radiation from cell phone alternatives, with studies showing adverse biological effects within the FCC's current "faulty" wireless limits for human exposure.

Margaret Baird⁵⁸

As a person diagnosed with Electromagnetic Radiation Syndrome (EMR-Syndrome), following a later-stage cancer diagnosis I had to go totally wired, including use of a landline instead of a cell phone, in order to heal, and not have pain or a recurrence of my cancer.

My radiation oncologist told me that electromagnetic frequency (EMF) radiation is what caused the cancer . . . I literally have had to pray before I answer the call with my digital line that I will be able to get through it without the call dropping, static, breaking up, or the other party being unable to hear me though I can still hear them. My past experience with a copper analog landline was excellent and reliable.

This has happened with emergency calls, business calls, cross-country calls as well as routine calls. It is not acceptable.

In addition, I have to pay nearly \$100 a month to Cox for my wired ethernet and digital landline service, instead of the much cheaper Wi-Fi specials, which I cannot use.. I have no access offered where I live to fiber optic alternatives.

In my personal experience, I and others with this EMR-Syndrome disability are being denied their civil rights of equal access to communication, including a working analog landline. It is a

⁵⁴ <https://www.fcc.gov/ecfs/search/search-filings/filing/109292066415839>.

⁵⁵ <https://www.fcc.gov/ecfs/search/search-filings/filing/10929715629096>.

⁵⁶ <https://www.fcc.gov/ecfs/search/search-filings/filing/10922352711788>.

⁵⁷ <https://www.fcc.gov/ecfs/search/search-filings/filing/1092842401057>.

⁵⁸ <https://www.fcc.gov/ecfs/search/search-filings/filing/1092911361179>.

violation of the Americans with Disabilities Act, as amended as well as other civil rights and disability rights.”

Jeanine Jacobs⁵⁹

“ . . . [M]any parents do not want their children to be exposed to these free-radical producing functions, as wireless---for physical, hormonal, neurological (mental/emotional) health reasons. Please reinstate the measures needed for the development, the use of and the repairs needed to continue Landline Usage.”

Deborah McBride⁶⁰

Hello FCC, I am extremely sensitive to Electromagnetic Fields, (radiation) and I must use my land line phone. Cell phones frequencies cause horrible health effects on me. I must have a land line. Do not take this away from me and my husband.

Elizabeth Barris⁶¹

we now have COURT EVIDENCE that the RF "safety" standards, which copper landline users could be forced to use should your proceeding pass, protect neither health nor safety. Our lawsuit against the FCC 5 years ago proved this. Here is a link to refresh your memory...<https://thepeoplesinitiative.org/wp-content/uploads/2022/11/FCC-Ruling-RF-Standards.pdf> And here is a link to 11,000 pages of evidence proving our point...<https://thepeoplesinitiative.org/lawsuits/fcc-lawsuit-2020-rf-standards/> just scroll down the page for evidence.

Nancy VanDover⁶²

I have not been able to tolerate being close to a cell phone for many years due to the electromagnetic sensitivity (EMS) I suffer now. There is a large disabled class with EMS in this country who depend upon corded landlines. The FCC has ignored this disabled class in their 30-year-old “safety” guidelines . . . The FCC needs to immediately respond to the court order decided in Environmental Health Trust, et al. v FCC, No. 20-1025 (D.C. Circuit. 2021) to update its guidelines through an independent body. The FCC should not override work that states have done to protect the public health and safety of their citizens. We need to continue Carrier of Last Resort Obligations. Besides providing the necessary accommodation for those disabled with EMS, other important reasons why our country should protect copper landlines include: • Landlines are the most reliable in disasters such as fires or when electricity is out. • Landlines work with medical alert systems and DSL. • Landlines don’t have the cybersecurity risks of cell phones. • For many regions of the country, this is the only option for phone service . . . People have been paying for maintenance of these copper landlines in their customer fees for many years. We want and need to continue using them. As more people learn about the bio-harm of cell phones, they, too, may be using them less and landlines more. The International Commission on the Biological Effects of Electromagnetic Field ICBE-EMF press release is online at <https://icbe-emf.org/who-funded-study-reports-high-certainty->

⁵⁹ <https://www.fcc.gov/ecfs/search/search-filings/filing/109292834114062>.

⁶⁰ <https://www.fcc.gov/ecfs/search/search-filings/filing/1092981970243>.

⁶¹ <https://www.fcc.gov/ecfs/search/search-filings/filing/1092856472193>.

⁶² <https://www.fcc.gov/ecfs/search/search-filings/filing/109291291607590>.

of-the-evidence-linking-cell-phone-radiation-to-cancer-in-animals/ "New WHO-Funded Study Reports High Certainty of the Evidence Linking Cell Phone Radiation to Cancer in Animals Scientific Experts Urge the FCC to Establish Science-Based Exposure Limits to Address Wireless Health Risks A new systematic review of 52 animal studies, "Effects of Radiofrequency Electromagnetic Field Exposure on Cancer in Laboratory Animal Studies" by Mevissen et al. (2025), concluded there is high certainty of the evidence linking RF radiation exposure to two types of tumors: gliomas in the brain and malignant schwannomas in the heart. Notably, the same types of tumors have also been observed in human studies, adding significant confidence that the associations observed in human studies are real." I respectfully request the FCC protect landlines and update the thermally-based guidelines to include biological effects. Until proper guidelines are in place, we need to use the Precautionary Principle instead of streamlining for more wireless deployment. Taking away safe phone communication from an entire disabled class is antithetical to 47 USC 332(a)(1) where Congress stated the FCC's first duty is "to promote the safety of life and property".

Florie Freshman⁶³

"I am highly allergic to wireless fields . . . I would never be able to work on a cellphone the screen makes me dizzy and my eyes burn."

Liz Tatola⁶⁴

Hi, We need to keep landline phones an option to reduce exposure to hazardous rf from cell towers and antennae. Isn't health in this country the worst it's ever been? Too much Rf is not safe. Do NOT get rid of landlines.

F. People Want Their Landlines Back

Amy Harlib⁶⁵

AT&T claims people are abandoning landlines, but many AT&T service reps are telling customers AT&T no longer services copper and they won't install landlines anymore. Many human bodies are not compatible with wireless technology. People get headaches, ear ringing, vertigo, nerve disruptions, cancers, and other health issues. People in remote or rural areas rely on copper landlines. Copper landlines work with DSL and medical alert systems. Customers have been paying extra fees in their phone bill for years to maintain copper landlines.

Desiree Jaworski⁶⁶

I need my landline at my house because my cell phone doesn't have the connection with the cell tower for me to talk on it. Even if I leave my house and go outside I can't talk to people on it. My whole family is affected by this and we all use the landline. Also, copper landlines work in emergencies when power is out. The Hawaii and California fire disasters are an example of

⁶³ <https://www.fcc.gov/ecfs/search/search-filings/filing/109301932505773>.

⁶⁴ <https://www.fcc.gov/ecfs/search/search-filings/filing/109300164519495>.

⁶⁵ <https://www.fcc.gov/ecfs/search/search-filings/filing/109230737831003>.

⁶⁶ <https://www.fcc.gov/ecfs/search/search-filings/filing/10929229938136>.

this - cell phones didn't work but landlines did. Battery back-ups for modems and routers (needed for cable and fiber optic connections) are unreliable. Many people I know like their landlines and use them but AT&T claims people are abandoning landlines when in reality AT&T service reps are telling customers AT&T no longer services copper and they won't install landlines anymore. Please keep our landlines functioning!!!!

G. Copper Wire, the Superior Technology

Victoria Sievers⁶⁷

Why is the FCC seeking comment on rulemaking measures that clearly favor industry rather than service to and protection of the public? So-called “streamlining” or “removing obstacles” are euphemisms for eliminating, undermining or diluting regulation that is needed to serve the public. With respect to voice connectivity, carriers claim that they can/will provide service equivalent to wired legacy service in quality and reliability, but they cannot and will not. AT&T is fond of repeating that copperwire service is antiquated—using the term in a pejorative manner. Telephoning must be modernized they insist. Really? Wired copper telephony remains the superior technology for accomplishing the critical, requisite task of providing safe, reliable voice communication under all conditions. No other system/device can boast of such. No other system is entirely free of electromagnetic radiation and therefore safe for the increasing numbers of EMR-sensitive citizens in our country who must rely on a well-managed fully-wired service. No other system provides the voice clarity often needed by seniors and disabled. Case in point: Recently I was speaking with a California woman on her Frontier-provided Voice Over Internet Phone (VOIP), when that phone went dead. Utterly dead. Two years previously she had chosen to contract for fiber Internet, but she was never informed that she would lose her trusty legacy phone. “It’s a nightmare,” she moaned. “Gawd I miss my real landline. Now I have dropped calls, a periodic dead phone, crackling on the line, interference with WiFi, multiple service calls, no recourse when the power goes out. . .” I often need to repeat dial to connect. . .” (and on she went.) Is this the kind of scenario—multiplied millions of times over—that the FCC is seeking to bestow upon U.S. citizens? Accelerating Network Modernization and Improvements should include repair and upkeep of copper landlines NOT exclusion in favor of fiber and wireless. Modernization should include using the most effective technology—copper landlines. Further, the FCC should not seek to overrule the rights of the states. In California, the CPUC and the state legislature have been listening to the people’s need for copper landlines. A significant number of households, government offices and businesses retain wired telephones in addition to their mobile devices. Customers have publicly testified that they have sought landlines but that AT&T has been refusing to provide them. AT&T has also been refusing to maintain them properly. Where’s the regulation here? For decades customers have paid for copper-landline upkeep and deserve what they’ve paid for. Please do your regulatory job for American citizens instead of assisting carriers like AT&T to enhance profits while they dis-serve and underserve your public.

⁶⁷ <https://www.fcc.gov/ecfs/search/search-filings/filing/109290140305953>.

Pam Scott⁶⁸

Dear FCC: "Accelerating Network Modernization" [25-208] and "Reducing Barriers to Network Improvements and Service Changes" [25-209] are absolutely misguided. They squander energy, and try to "fix" things that aren't broken. Copper land line service is far superior to any wireless technology in terms of sustainability, reliability, and quality.

Esther Mander⁶⁹

I am very much opposed to any communications service changes in the name of "modernization" that would lead to the demise of copper landlines. This shortsighted move would handicap many rural areas in the event of natural disasters. Copper landlines work in emergencies when the power is out. Not having reliable communication during emergencies is the difference between life and death.

I live in an area of the Big Island of Hawaii where there is no cell service. I rely 100 percent on my landline. If I wanted, i could receive cell service though my wi-fi. Well, that's all well and good until a hurricane or storm hits, which are common in my area. The power goes out, and the cell service goes out. We need reliable communications during emergencies.

Copper landlines have been reliable for a century. People may call them "antiquated," but they remain highly functional. Should we also get rid of all combustion engine cars because they, too, are antiquated, compared to electric cars? If the thing ain't broke, why get rid of it? Landline infrastructure that is already in place serves a valuable function for the safety and well-being of Americans. **It is absolutely peanut-brained to let that infrastructure collapse.** [Emphasis added]

⁶⁸ <https://www.fcc.gov/ecfs/search/search-filings/filing/1092916290972>.

⁶⁹ <https://www.fcc.gov/ecfs/search/search-filings/filing/109291874701062>.