

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of: Petition of AT&T for	)	
Forbearance Under 47 U.S.C. § 160(c) from	)	WC Docket No. 26-123
Requirements Imposed on Eligible	)	
Telecommunications Carriers by 47 U.S.C.	)	WC Docket No. 26-125
§ 214(e) ¹	)	

REPLY COMMENTS OF WIRED BROADBAND, INC.

AND THE FILING PARTIES

ON BEHALF OF AMERICANS INJURED AND DISABLED

FROM ELECTROMAGNETIC RADIATION

(ELECTROMAGNETIC RADIATION SYNDROME – EMR SYNDROME)



Filed July 7, 2026

¹ DA/FCC #: DA-26-598

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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.

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Introduction

Wired Broadband, Inc., and the Filing Parties set forth in **Appendix A**, respectfully submit these reply 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 across the country. We advocate for the safe deployment of communications infrastructure.

Note: Incorporated herein by reference are the Reply Comments of Wired Broadband, Inc. and the Filing Parties set forth therein from WC Dockets: 25-208, 25-209 and 25-311.²

We are in **strong opposition** to the proposed retirement of AT&T's landlines. One of the primary reasons is that there are no other sufficient alternatives, and that cellular service is woefully deficient during disasters.

By allowing AT&T to eliminate 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, affordable telecommunications service in the U.S., with a statutory mandate "to protect life and property through the use of wire and radio communication."³ Removing copper landlines would endanger the lives of Americans because there is no adequate or reliable

² [https://www.fcc.gov/ecfs/search/search-filings/results?q=\(proceedings.name:\(%2225-208%22\)+AND+filers.name:\(%22wired%20broadband%22\)\)](https://www.fcc.gov/ecfs/search/search-filings/results?q=(proceedings.name:(%2225-208%22)+AND+filers.name:(%22wired%20broadband%22))).

³ Communications Act of 1934, as amended by the Telecommunications Act of 1996, 47 USC §151 *et seq.*

substitute in the event of an electrical or cellular outage. Internet and wireless communications are not an adequate substitute for copper landlines. Cellular, even when it does work, is not a substitute for people suffering from Electromagnetic Radiation Syndrome (EMR-Syndrome).

At a bare minimum, the Commission should require that any forbearance and/or relinquishing of ETC **must** be contingent upon the affected homes being served by at least one **wired** broadband provider so that residents can, at a minimum, avail themselves of wired IP-based voice service. Fixed wireless and mobile wireless have dramatically inferior reliability and are not substitutes for wired voice connectivity.⁴

Highlighted below are some of the comments from WC Dockets 26-123 and 26-125.

Comments on the Need for Landlines

These Reply Comments show that an overwhelming number of commenters need their landlines and they show a lack viable alternatives to landlines: (1) no reasonable or reliable voice substitutes for landlines, (2) no power outage contingencies, (3) no emergency preparedness, (4) no other accessibility for individuals with disabilities. Therefore, commenters would be completely left without reasonable, workable voice substitutes.

⁴ AT&T petition for forbearance, at page 6 and page 30, filed May 20, 2026 <https://www.fcc.gov/ecfs/search/search-filings/filing/10520920917144>, stating "*nearly all serviceable locations have access to at least one alternative provider of facilities-based **fixed broadband or mobile voice** service.*" [emphasis added] This statement elides the fact that fixed broadband could refer to wireless and that mobile voice by definition is exclusively wireless.

There have been 848 comments filed for dockets 26-123 and 26-125, most of which to keep their landlines. Here are a few comments highlighting the importance of keeping landlines.

NO ADEQUATE SUBSTITUTES

CA Public Utilities Commission and the People of CA (26-120 26-121)

Because AT&T has failed to demonstrate that granting its applications would not adversely affect the public convenience and necessity, the Commission must reject them as a matter of law . . . AT&T's discontinuance applications rely principally on the availability of AT&T's LTE-based Advanced Phone service, and claim that affected customers are served by one or more "facilities-based mobile wireless" provider as well. AT&T has not shown, however, that the indoor mobile voice coverage in the affected areas—as opposed to the outdoor coverage—is sufficient to render wireless service an adequate substitute for AT&T's wireline residential and business services.

INJURIES FROM ELECTROMAGNETIC RADIATION; PROVIDING EMERGENCY INFO TO FIRST RESPONDERS

Julie Levine (26-123)

I suffer from EMR-Syndrome and cannot use wifi or cell phones. I run a business from my home and also rely on my landline for personal and emergency communications in situations including fires and major injuries. **I have zero options for substitute service.** Copper landlines work in emergencies when power is out. They supply their own power. **Cell phone networks didn't work in CA fire disasters but landlines did.** Battery back-ups for modems and routers (needed for cable and fiber-optic connections) are unreliable and only last for brief periods, up to 24 hours, when sometimes needed for days and weeks. Cell phone connections have cyber-security risks. Many human bodies are not compatible with wireless technology. **People get headaches, ear ringing, vertigo, arrhythmias, nerve disruptions, cancers, and more.** Customers have been paying extra fees in their phone bill for years to maintain copper landlines. Copper landline 911 service provides exact location data to emergency responders when seconds count – a house invasion, a fire, someone is choking, has a heart attack, or stroke. Landlines are lifelines! **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. This is in defiance of their obligation. [Emphasis added]**

BIOLOGICAL RISKS OF CELLULAR SERVICE; NO ADEQUATE SUBSTITUTES DURING DISASTERS

Ted Clausen (26-123 26-125)

Copper landlines work in emergencies when power is out. They supply their own power. Cell phone networks didn't work in CA fire disasters but landlines did. **Many people cannot tolerate wireless technology. People get headaches, ear ringing,**

vertigo, arrhythmias, nerve disruptions, cancers, and more. [Emphasis added]

Customers have been paying extra fees in their phone bill for years to maintain copper landlines. The alternatives to copper landline that AT&T proposes do not fulfill the bill for available, reliable, and affordable, which copper has been doing for decades.

CYBERSECURITY AND BIOLOGICAL RISKS OF CELLULAR SERVICE; NO ADEQUATE SUBSTITUTES DURING DISASTERS

Lynn Campbell (26-123 26-125)

I am writing to ask that the FCC deny all AT&T petitions looking for removal of their obligation to provide basic landline service to millions of California residences and businesses. While I don't live in California, I count on the landline in my home, my lifeline to the outside world, on a daily basis. I am sensitive to the electromagnetic radiation generated by cell phones, and I am concerned that if the FCC releases AT&T from its obligation, setting a precedent, it won't be long before we will ALL lose our landlines. Please recognize the following: • During the CA fire disasters, cell phones didn't work but landlines did; not only did they work, but when callers use 911, unlike cell phones, landlines provide the exact location data needed for emergency responders when seconds count. • Cell phone connections have risks associated with **cyber-security. [Emphasis added]** This is particularly important to the elderly. • I'm not alone in my sensitivity to wireless technology. You're surely aware of the myriad of adverse effects it causes documented in the peer-review literature (if not, please review the 11,000 pages of documentation submitted by plaintiffs in Environmental Health Trust et al. v. FCC) • I understand that as a landline user, I've been paying extra fees over many years to maintain copper landlines, and, although my monthly bill is now over \$100/mo – and cell service would be considerably cheaper - I maintain my landline because of its safety and the many other benefits outlined here. • AT&T claims people are abandoning landlines, but I understand that many AT&T service reps are telling customers AT&T no longer services copper and they won't install landlines anymore. This is in defiance of their obligation. Please deny these petitions. I am counting on your leadership to require AT&T's ongoing maintenance of Basic Service for any Californian resident or business that wants it.

AT&T HAS PUT UP A BARRIER AGAINST THE USE OF LANDLINES

Judy Frankel (26-123)

Copper landline 911 service provides exact location data to emergency responders when seconds count – a house invasion, a fire, someone is choking, has a heart attack, or stroke. Landlines are lifelines! **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. This is in defiance of their obligation. [Emphasis added]**. Some customers have given up landlines because AT&T was not maintaining them for months and years. Another defiance of obligation. The alternatives to copper landline that AT&T proposes do not fulfill the bill for available, reliable, and affordable, which copper has been doing for decades.

AT&T'S FLIMSY EXCUSE FOR AN ADEQUATE SUBSTITUTE

Anura Lawson (26-121)

I respectfully urge the Federal Communications Commission to deny, or at minimum substantially condition, AT&T California's request to discontinue traditional copper-based residential telephone service throughout California.

AT&T argues that consumers have adequate alternatives available through wireless, fiber, cable, satellite, and Voice over Internet Protocol (VoIP) services. However, the FCC must evaluate not merely whether alternatives exist, but whether those alternatives provide equivalent reliability, accessibility, public safety protections, and universal availability for all consumers.

For many Californians, copper landline service remains a critical public safety resource.

Traditional copper landlines continue to function during commercial power outages because the telephone line itself carries power. Unlike wireless phones, VoIP services, cable voice services, and fiber-based voice services, copper landlines do not generally depend upon customer-owned batteries, backup power systems, routers, modems, cellular coverage, or broadband connections.

California regularly experiences earthquakes, wildfires, floods, public safety power shutoffs, extreme weather events, and prolonged electrical outages. During these emergencies, landlines often remain among the most dependable forms of communication available to vulnerable residents.

As a California resident, parent, educator, and long-time landline user, I have personally relied upon wired communications because of concerns regarding reliability, emergency preparedness, accessibility, and continuity of service.

I am particularly concerned about the impact on seniors, individuals with disabilities, medically vulnerable residents, rural communities, and low-income households participating in Lifeline programs. These populations are disproportionately harmed when communications services become dependent upon commercial power, battery maintenance, broadband subscriptions, or reliable wireless coverage.

AT&T's filings repeatedly assert that mobile wireless service is an "adequate replacement" for copper landline service. However, many Californians know from experience that wireless networks become congested during emergencies, may fail during prolonged power outages, and often do not provide the same level of location certainty associated with traditional landline service. [Emphasis added]

The Commission should also consider that many Californians continue to rely upon landlines because they have chosen not to adopt wireless technologies, lack reliable cellular coverage, or require communications solutions that are not dependent upon radiofrequency-based technologies.

Additionally, AT&T seeks not only to discontinue service but also to preempt California's Carrier of Last Resort protections. Carrier of Last Resort obligations exist because communications services are essential infrastructure. These obligations

ensure that residents are not denied access to basic telephone service because they are rural, elderly, disabled, low-income, or otherwise costly to serve.

The FCC should not permit the elimination of long-standing consumer protections without clear evidence that every affected customer will continue to receive reliable, affordable, and universally available service.

I am further concerned that AT&T's customer notices failed to adequately explain the significance of these proceedings, failed to clearly inform customers how to oppose the applications, and failed to make many customers aware that the discontinuance requests could affect their future access to traditional landline service.

The FCC's public interest obligation requires careful consideration of public safety, emergency preparedness, accessibility, reliability, affordability, and universal service. At a minimum, the Commission should require:

- Preservation of existing landline service wherever requested by customers.
- Continued Carrier of Last Resort protections.
- Explicit protections for Lifeline customers.
- Independent verification that replacement services function during extended power outages.
- Demonstrated 911 reliability equivalent to traditional landline service.
- Protection of customers with disabilities and medical needs.
- Continued service options for customers who do not wish to rely on wireless technologies.
- Additional public hearings throughout California before any discontinuance approval.

The public interest is not served by eliminating reliable communications infrastructure before equivalent protections have been guaranteed.

For these reasons, I respectfully request that the FCC deny AT&T's application or impose substantial consumer protection conditions before granting any discontinuance authority.

VAST ADVANTAGES OF COPPER LANDLINES OVER ALTERNATIVES

William & Susan Bromiley (26-123)

Traditional copper landlines carry their own power source from the telephone exchange. When electricity goes out or cell towers are overloaded during wildfires, earthquakes, or storms, a corded landline generally still works and for us that has been a true fact since living here. Maintaining a working landline is vital for surviving natural disasters which our neighborhood is highly prone to given our very close proximity to the Peninsula Open Space in Northern California. Examples for our neighborhood have been:

- the fires that shut off access to the only two roads available to us to get out, making us isolated in our home which has happened numerous times since residing here,
- retaining service during power outages with the last outage we experienced recently lasted 12 hours;

We were grateful to have our landline to reach out to unaffected friends outside our neighborhood to get the latest news updates so we knew what was happening, -- securing highly reliable 911 location tracking which we just required several times in the last recent months when needing to call 911 for emergency help **after my husband fell, badly injuring his head and was bleeding and dazed and unable to get up. Fortunately 911 dispatched the nearest fire station crew who came in under 10 minutes saving my husband's life. [Emphasis added]** This has also been the experience of several residents in our neighborhood in recent years. -- distorted audio is an ongoing issue when speaking to folks who only use cell phones.

Living where we do, our landline has always been reliable, dependable and served us well as each disaster has occurred. We have attended presentations by the local Fire Department over the years on what safeguards we can employ to ensure our lives are protected. One ongoing recommendation of the Fire Department is to have and maintain a local landline for emergency situations. Solid advice and followed by us. We gladly pay the ongoing increases by AT&T for our landline to insure the safety of our lives.

Conclusion

For the foregoing reasons, and the reasons given in our filing with respect to 25-208, 25-209, 25-311, WBI and the Filing Parties are opposed to the retirement of landlines as many people in California and in communities across the country depend on landlines, including those disabled by electromagnetic radiation and have no other means of communicating except by wire. The Commission's primary mission is to serve the public interest as established in the Communications Act, otherwise, the Commission is going far afield from the stated purpose that gave rise to its existence.

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

Respectfully Submitted,



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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, NY	
The Weston A. Price Foundation, Sally Morell Fallon, President, Washington, D.C.	
Wired Broadband, Inc., 501(c)(3), Odette J. Wilkens, President & General Counsel	
Alliance for Natural Health - USA, Robert Verkerk, PhD, Executive and Scientific Director, Alexandria, VA	

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, Scottsdale, AZ, with EMR-Syndrome
	Susan Molloy, M.A., Snowflake, AZ
	Melissa Hayes, M.S., Oro Valley, AZ, Oak Haven Wellness, LLC, with EMR-Syndrome
	Renée Neumann, Tucson / Green Valley, AZ
	Kathy Flanagan, Prescott Valley, AZ, with EMR-Syndrome
	Karen Carswell, Flagstaff, AZ
	Warren Woodward, Sedona, 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-S, 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, CA, with EMR-Syndrome
	Gene Wagenbreth, Topanga, CA
	Margaret Holt Baird, Esq, San Diego, CA, with EMR-Syndrome

	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, CO, disabled by EMR
	David Byrd, Byrdman Publishing, Longmont, CO 80503 disabled by EMR-S
	La Plata for Safe Technology, Ingrid Iverson, La Plata County, CO, with EMR-Syndrome
	Longmont for Safe Technology, Doe Kelly, Co-Founder, Longmont, CO, with EMR-Syndrome
	Deborah Shisler, CO, with EMR-Syndrome
	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	Florida Coalition for Safe Technology, St. Pete's Beach, FL
	Lauren Mones, St. Pete's Beach, FL
	KellyLee McFrederick, St. Pete's Beach, FL
	Kay Fitt, Palm Harbor, FL; Susan Lee, Miami, FL
	Susan Lee, Miami, FL
	Connie White, Miami Beach, FL, with EMR-Syndrome
	Shirley Denton Jackson, with EMR-S, 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, Houme, LA, with EMR-Syndrome
MA – Massachusetts	Massachusetts for Safe Technology, Cecelia Doucette, Director, Ashland, MA
	Pittsfield Cell Tower Injured & Concerned Citizens, Pittsfield, MA, injured with EMR-Syndrome
	Safer Siting 01240, Lenox, MA
	Safe Tech International, Patricia Burke, journalist, Millis, MA, with EMR-Syndrome
	Sustainable Upton, Laurie Wodin, Co-Administrator, Upton, MA, with EMR-Syndrome
	Last Tree Laws (.com), Kirstin Beatty, Director, Holyoke, MA, with EMR-Syndrome

	The Leto Foundation, Westborough, MA
	Alison McDonough, Canton, MA, with EMR-Syndrome
	Janet FitzGerald, M.S., CCC-SLP Rowley, MA, member of Massachusetts for Safe Technology
	Anna Nelson, Pittsfield, MA, with EMR-Syndrome
	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	DAMS, Inc., 501(c)(3), educates public on dental health issues, St. Paul, MN
	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, Black Mountain, NC, with EMR-Syndrome
NE - Nebraska	Tammy Lee, Lincoln, NE, with EMR-Syndrome
	Linda Becker, Lincoln, NE
NH - New Hampshire	New Hampshire for Safe Technology, Deb Hodgdon, Stratham, NH, with EMR-Syndrome
	Kent Chamberlin, PhD, former member of NH Commission to Study Env't'l and Health Effects of Evolving 5G Technology; Prof. & Chair Emeritus, Fullbright Distinguished Chair, Univ of NH, Coll. of Eng and Phys Sci, Dept. Of Electrical and Computer Eng
NJ - New Jersey	Lisa Allen, Plainfield, NJ
	Diane Grossi, East Hanover, New Jersey, with EMR-Syndrome
NM - New Mexico	Lori Bagley, Concerned Individual, Albuquerque, NM, with EMR-Syndrome
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 with EMR-Syndrome, NYC (Stuyvesant Town), NY
	Barbara Stemke, New Paltz, Ulster County, NY
	Toby Stover, High Falls, NY
OH - Ohio	Craig McDowell, veteran, Rocky River, OH
	Erin McDowell, Registered Nurse, Rocky River, OH, Southwestern, with EMR-Syndrome, Ohio for Responsible Technology (SWORT)
	Jennifer Manzler, Certified Health & Wellness Coach, Cincinnati, OH, 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, Ashland, OR, with EMR-Syndrome
	The Soft Lights Foundation, Mark Baker, President, Beaverton, OR
PA - Pennsylvania	EMR Syndrome Alliance, Pennsylvania, PA
	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, Annandale, VA, with EMR-Syndrome
VT - Vermont	Martine Victor, VT

WA – Washington	Citizen League Encouraging Awareness of Radiation, C.L.E.A.R., Mark Wahl Director, Langley, WA
WI - Wisconsin	Katrine Colton, Sheboygan, WI, with EMR-Syndrome
	Tracey Seymour, Westfield, WI, with EMR-Syndrome
	Carol Seibert, with EMR-Syndrome, Trevor, WI

Europe	Filing Parties
Sweden	Eva Christina Andersson, E.U., Sweden