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To: Whom it may concern:

September 3, 2011

Re; Connecticut Utilities Storm Failures

AT & T in Connecticut has created design flaws in its infrastructure that created unacceptable outages during Tropical Storm Irene.

They AT & T, with intent, never placed permanent emergency generators or even robust battery back-up systems at their "SLIC" sites and "DSLAM/ATM" locations which allowed local "POTS" (Plain Old Telephone Service) lines to fail at an extremely high rate and at a very bad time. AT & T would probably tell you that they provided equipment and services that met acceptable industry standards, but who would support having these very minimal industry standards when attempting to utilize these nonexistent systems for a life threatening emergency in your household during this storm emergency?

Many Connecticut customers were no longer able to dial E-911 or any other number from their POTS line do to corporate malfeasance and greed. We in Connecticut had come to expect the very best in reliable landline telephone service for many years when the utility was locally owned and managed by SNET, but that is no longer the case under the current AT & T ownership and past oversight from the State of Connecticut DPUC. The consumers in the State of CT were the big losers during this storm and the CT DPUC allowed AT & T to create a very unstable network that failed when Connecticut's citizens needed it the most.

The safety of Connecticut citizens was absolutely in jeopardy in the aftermath of this storm and AT & T failed miserably to maintain their wire line infrastructure for the public good.

The loss of the utilities DSLAM/ATM infrastructure also caused internet failures even if the consumer still had commercial or generator power at his home. The emergency information that was being sent out by the State of CT and local municipalities via internet was not received because of cost cutting design flaws that allowed the utility to not maintain services beyond a few hours at the very best from the these ill designed systems. Connecticut consumers were striving to obtain accurate and timely information and almost all currently acceptable wired telephone and internet transmission systems failed during and shortly after the storm.

## Solutions: The State of CT should enact and enforce the following or similar minimal regulations through state tariffs and or legislation.

#1 "All" landline service providers operating in Connecticut shall maintain emergency power sources at all critical infrastructure points to ensure that "all POTS and IP based phone circuits" stay live for a

minimum of 336 hours without any human intervention, "unless" the telco or CATV cable servicing that area or home has been deemed unusable due to physical damage or localized flooding. Furthermore these same telco utilities should be required to maintain all "T-1" type circuits for the same minimum time standards. It is now widely understood that the vast majority of Verizon Wireless site failures during this storm were due to the inability of Connecticut AT & T to provide emergency power to the T-1 lines bringing phone circuits to these critical cellular sites.

#2 "All" Cellular service providers operating in Connecticut shall maintain emergency power at individual cellular sites for a minimum of 336 hours without any human intervention. The utility may obtain a certain amount of waivers for various sites that may not lend themselves to emergency power on a localized level but the waivers should be very far and few between.

#3 "All" utilities providing the above telephone, cellular and internet services to consumers in The State of Connecticut shall be required to maintain a percentage of "back up" emergency generators within the State of Connecticut's borders that would enable rapid deployment to individual Connecticut sites where permanent generators and or batteries may have failed or been depleted, during the course of the of the emergency or storm.

#4 "All" utilities conducting business in The State of Connecticut shall strive to maintain emergency power systems for much longer than the aforementioned 336 hours. The State of Connecticut must set minimum acceptable time standards for emergency operations of these providers and their services at the very least and these issues should be taken up and considered jointly by Utility Control at DEEP and legislatively at the State Capitol. We should strive to have the very best systems not just industry acceptable systems.

This correspondence is not intended to besmirch or belittle the hard work of Connecticut's front line utility workers who strive to provide the very best in services to Connecticut consumers with less and less resources due to corporate greed. This letter is more of a critical critique of poor management decisions at the very top levels of these corporations who have decided corporate and personal profit was much more important than providing dependable utilities to the very consumers who pay dearly for it and expect much better reliability and services than they currently receive in the State of Connecticut.

Respectfully Submitted; Jeff D Lee