

***In the Matter of FCC Docket #01-304  
NOI entitled  
“Inquiry Regarding Carrier Current Systems, including Broadband over Power Line  
Systems”***

***Comment By Steven E. Matda  
May 1, 2003***

As a licensee in the amateur service (Amateur Extra class call KE4MOB) and as an internet user, I feel I must comment on the above entitled proceeding.

As it currently stands, there are several methods by which citizens are able to access broadband. These include DSL, cable, and broadband satellite service. The existing services do an admirable job of providing service at a reasonable cost to a great number of users across the country. Competition between the cable, telephone, and ISP companies have drastically brought costs down and improved service levels to the average citizen. As a result, we are now seeing some companies being forced into bankruptcy because of diminishing margins. It remains to be seen how the deployment of BPL will enhance competition. In fact, it may reduce competition, as some companies may be unable to survive in a BPL-served area.

From an RF standpoint, the existing DSL, cable, and satellite systems are either closed RF systems by design, or are primary occupants of the spectrum in which they transmit. Therefore, interference is either minimized or avoided altogether.

However, if BPL systems are brought into full deployment, I am concerned that interference could become a major problem. As it currently stands, the FCC enforcement actions relating to amateur spectrum show an inordinately high number of complaints by amateurs against electrical utility systems. These complaints usually involve the power grid becoming an unintentional radiator of RF energy—which BPL systems are known to cause. Unless strong measures are put in place to protect incumbent users of spectrum, the FCC could conceivably be swamped with RFI complaints, thus prohibiting the commission from enforcing more serious rule violations.

In countries where BPL has been deployed, amateur radio operators have experienced drastic increases in levels of HF noise. Paraphrasing one Japanese amateur (JA2WWE) who recently posted to the [www.eham.net](http://www.eham.net) web site:

“I have all but given up on any band but 10 meters because of interference..here in Tokyo, no band is safe from noise. The low bands are only a dream for many here in Japan.”

More independent, verifiable investigation is needed to fully quantify the interference potential of BPL *before* its carte-blanche deployment here in the US. Anecdotal evidence exists that BPL is detrimental to incumbent users of spectrum, and *just this evidence alone* should be enough to raise questions about BPL’s capability to provide a needed service without risking the functionality of other services.

Broadband access is a wonderful thing, and BPL is a novel way to provide that access. However, current users of the spectrum (such as the US military and amateur radio operators) should not have to wade through an “RF soup” created by BPL. The Commission needs to look past the wonderful catch phrase of “increased competition” and fully investigate the impact to incumbent users of the spectrum before full deployment of BPL occurs.

I thank the Commission for its time.

Respectfully,  
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