

I am writing to express my opinion with regards to ET Docket Matter No. 03-104.

I am a licensed radio amateur with the call using of KG6AMW and would like to express my concern over possible interference problems in the frequency range of 1.8-54 MHz. due to the deployment of this new technology, Broadband Over Power Line (PLC).

#### I. INTERFERENCE POTENTIAL

Access PLC will use electrical distribution lines, overhead or underground, to provide broadband Internet access to homes and businesses. Because their wiring is physically large, often overhead and extends across entire communities, access PLC systems pose a significant interference potential to over-the-air radio services.

Preliminary field studies have been done by a number of National Amateur Radio Societies who have determined that a significant interference potential exists with PLC implementation. These radio societies support the American Radio Relay League's (ARRL) preliminary findings that the ambient RF noise level near PLC systems could increase as much as 70 dB thereby preventing amateur radio activity.

#### II. INTERFERENCE WITH AMATEUR RADIO

Amateur Radio operators set up and operate organized communication networks locally for governmental and emergency officials, as well as non-commercial communication for private citizens affected by the disaster. Amateur Radio operators are most likely to be active after disasters that damage regular lines of communications due to power outages and destruction of telephone lines. Many radio amateurs are active as communications volunteers with local public safety organizations. In addition, in some disasters, radio frequencies not coordinated among relief officials and Amateur Radio operators step in to coordinate communication when radio towers and other elements in the communications infrastructure are damaged. At the state level, hams are often involved with state emergency management operations. In addition, hams operate at the national level through the Radio Amateur Civil Emergency Service (RACES) which is coordinated through the Federal Emergency Management Agency, and through the Amateur Radio Emergency Service (ARES) which is coordinated through the American Radio Relay League and its field volunteers. In addition, in areas that are prone to tornadoes and hurricanes many hams are involved in Skywarn, operating under the National Weather Service. Many national organizations have formal agreements with the Amateur Radio Emergency Service (ARES) and other Amateur Radio groups including (Federal Emergency Management Agency), (National Communications System), (American Red Cross), (Salvation Army), (National Weather Service) and (Association of Public Safety Communications Officials). The implementation of PLC with the potential of accompanying interference will hamper Amateur Radio emergency support activities.

#### III. CONCLUDING REMARKS

I would like the Federal Communication Commission to thoroughly examine these potential problems before widespread deployment of PLC technology is introduced, specifically, minimal levels of radiated energy and robust system protection from transmitter radiation. The amateur radio service provides a great public service in times of

disaster or during commercial communications failures and could be severely hampered by the rise in RF noise levels generated by egress and ingress of RF by this system. In Urban areas, HF and VHF communications could be almost impossible due to interference. It is imperative that the FCC give this matter a careful and extended investigation before any implementation can be considered.

Respectfully Submitted

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