

I make these comments as a trained Electrical Engineer who is familiar with both HF operations and power company economic realities due to my vocation and avocation.

It is my opinion that BPL should be dismissed as another technology that is not practical in the real world environment of the United States. I base this opinion on the following:

1. In my experience, power company personnel have been unable to deal with even routine EMC and EMI issues in the past and in currently operating facilities. The US power system is an unintentional radiator of huge size. As an example, currently in my residential neighborhood, there is power line radiated interference on MW and SW frequencies that prevents use of amateur frequencies and AM MW frequencies in all but the dampest weather.

2. The BPL business model is flawed. I believe that it is an attempt at competition with more viable DSL and cable/fiber delivery of broadband by other businesses. The basic cost of a modem or attachment device will be the same regardless of the delivery medium. That cost is driven by volume and technology. The volume and technology for cable and telco delivery of broadband services is well proven and currently profitable (even if marginally so). BPL will not provide any substantially more economical or practical delivery mechanism.

3. It is my understanding (cites available in comments by others) that BPL has been investigated in other countries and overwhelmingly discarded.

4. The short wave spectrum is a critical resource that is required for proper operation of government, military, aircraft, and other point-to-point communications as well as amateur operators. Any studies now planned will take place in a narrow gap of the sunspot cycle, and will not be applicable in the future when propagation is again enhanced during other phases of the cycle.

In short, it is my belief that should BPL be allowed, the shortwave bands used by government, military, amateurs, and broadcasters will be useless in a short time. BPL should be dismissed out-of-hand presently.

Respectfully submitted,
John W. McCain