

Dear FCC, Broadband over Powerline (BPL) technology, if implemented in the US, will pose a severe threat to HF communications of all services, both to two-way communications and broadcast reception:

1. Power distribution lines are not designed to be transmission lines for high frequency signals. As a result, relatively unpredictable radiation will occur which will cause local disruption of licensed, radiated HF communications. Higher than optimum powers will have to be used to ensure signal delivery to destination points.
2. Especially since the advent of ALE (Automatic Link Establishment) technology, many government and private concerns now rely on HF for routine and emergency communications. These services could easily be disrupted by local interference created by BPL. Amateur radio service will also be disrupted, hampering a fertile development ground for future RF technology, and training ground for existing communications methods.
3. Due to the proliferation of poorly-shielded consumer electronics, local interference from FCC type-approved equipment already easily exceeds the levels foreseen by part 15 regulations. BPL will exacerbate this situation further.
4. The existing PSTN and CATV utility distribution infrastructures currently offer sufficient bandwidth to support existing consumer broadband demand once the required distribution equipment is installed. Furthermore, these systems are specifically designed to transmit broadband signals with little radiation. Until demand for these assets exceeds the existing supply, broadband transmission should be limited to them only.
5. Power utility concerns interested in broadband distribution should be allowed, in the interest of competition, to operate same. However, this distribution should only occur using proven RF transmission media. Since power companies generally have access to power poles, they may install their own coaxial or balanced wiring on them, over which they may carry broadband without radiating interference, in lieu of using power wiring.
6. BPL has been tested and rejected in other countries, such as Germany, due to radiated interference as described above. Pursuing the same implementation in the US will produce results that are no different from those observed in other countries.

Best Regards,
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