

The BPL proposal will effectively kill MF and HF communications and has the definite possibility of interfering with critical public-safety communications as well as other broadcast services.

Free-space radiation from the power grid, which according to tests by the RSGB and others appearing to be in excess of Part 15 rules, will most likely increase the noise floor at receiving locations such that the spectrum from .5-40 MHz would be virtually unusable. Also, interference INTO the BPL system from legal emitters in this spectrum are also likely to cause disruption of the BPL system.

It is apparent from recent FCC actions that the power industry does not have a stellar reputation when it comes to resolving RF interference issues. I wonder what responsibilities these companies will have in resolving RF interference when they have *intentional* RF emitters causing wideband and indiscriminate interference.

Harmonics of poorly-maintained BPL systems also have the potential to interfere with existing public-safety radio networks. The Federal Government already recognizes that these nets are critical to Homeland Security; it is incomprehensible that the FCC could consider endangering these already fragile (as evidenced by 9/11) radio systems.

Last, BPL is a solution looking for a problem. There are already many broadband digital services that peacefully coexist with existing spectrum users - be it digital cable, direct satellite, DSL, etc. The proponents of BPL have not justified the essential blackout of MF/HF communications in the US for such an infinitesimal gain.