

In regards to proceeding 03-104, I am filing this comment in strong opposition. BPL is yet one more way in which the radio spectrum will be inundated with interference. This interference, had it been caused by a person, should be classified by the FCC as "harmful interference" as it has the potential to cause a failure of a communication system that otherwise would be able to be used.

I certainly understand that adding BPL to the arsenal of other broad band communication possibilities would foster competition among the broad band internet industry, but it is not necessary. It serves no purpose that has not already been addressed by other means of broad band access that are as secure, reliable and cost effective as they are, and that do not pose a threat to radio communications.

We already have DSL, CABLE, and Satellite access to the internet. BPL is not necessary. Allowing it will simply cause problems, not provide solutions.

Studies done in several international communities have failed to establish a means by which BPL can be effectively used without causing substantial interference to a major portion of the radio spectrum. Some of those countries have therefore abandoned their plans to permit BPL services to be established.

One of the primary concerns for amateur radio operators, in regards to BPL, is the potential for there to be so much interference caused, that effective communications during times of emergencies will be severely affected.

In times of disaster and emergencies, amateur radio operators are often called upon to be able to provide reliable, efficient radio communications. The frequencies that are used to provide these communications could potentially be severely impacted by the added noise of BPL signals transmitted over open, unshielded powerlines. The military continues to use HF frequencies for their communications and would be impacted by BPL as well.

The American Radio Relay League recently announced an Affiliation between the ARRL and the Department of Homeland Security in support of disaster preparedness and emergency response. Apparently the DHS has recognized that amateur radio operations are something that should be protected. The FCC is also involved with the DHS, and I would urge you to take this into serious consideration before making a mistake.