

July 23, 2003

Here are my comments regarding docket 03-104.

It seems that the commission is jumping head first into this proposed change without committing to important safeguards. Incumbent licensed stations need ironclad rules to protect them from this unlicensed unintentional radiator.

As the head of investigations for the Greater Cincinnati Local Interference Committee, I can speak with experience the problems that 'normal' power line interference causes. We have dealt with numerous interference sources that were originating with our local power company. One major case near Mason, Ohio took over two years to resolve, but not without the involvement of the FCC Enforcement Bureau. Another case in Middletown, Ohio took 2 and a half years to resolve without FCC involvement. There were numerous others that could be cited.

This is an indication of the cooperation we will get from the local power company should the BPL be allowed.

Should this docket proceed, it will probably cause the end of amateur high frequency operations from homes. Does the commission want that?

Tests in other countries, including Japan, showed a dramatic increase in the noise floor on the amateur high frequency bands and the shortwave broadcast bands. The test BPL signals covered all but the strongest stations on the high frequency bands. Does the commission want that?

Does the commission want to hire the additional staff in the enforcement bureau to handle the additional complaints this will cause?

If BPL is adopted, you MUST adopt rules to protect amateur radio operations on high frequencies. There must be a swift process for ending any harmful interference that BPL will cause.

But, do the right thing, don't cave into the big money interests here. Do not adopt BPL.

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