Dear FCC,
*Regarding the Notice of Inquiry in ET Docket 03-104,
please refer to my previous posting on 6/24/03.

*Regarding the recent posting by Adaptive Networks, Inc.,
and in reference to the ANSI C63.4 testing guidelines,
It is very likely that the 30 meter limits are inadequate.
Most residential structures are located far less than this
distance to any power lines. And just the conducted noise
would carry unwanted energy to a sensitive HF receiver.

*In reference to wire length tests, testing done with 1/2,
1/4, and 1/8th wavelength is inadequate because the actual
conductors that will be used are millions of times greater
in length than these tests, therefore the incident SWR of the
system under test would have optimal results compared to
the "infinite" actual lossy conductors.
Also the test will not account for lossy line insulators
and faulty grounds/rectifying leakages extensively
found in the power system grid today.

*The antenna position test is strictly "near field" and
will not account for possible skip zone distances.
This is especially true for the bands between 14 and 28Mhz
during the daytime. Will the test look for unwanted
reception of signal at various skip distances? The polatity
of the test antenna is unimportant in skip zone testing
as the ionosphere will distort the polarity in a random
fasion.

*The wire termination testing is again at fault because of
the very long conductors that will be used. In just one
wavelength the return conductor will have an open and a
short to the termination, depending on base frequency.
Most power service to an outlet is fed by more than 1/2
wavelength of unshielded cable at HF frequencies,
thus the return line would effectively have an open circuit
to ground at these frequencies.

Summary:

The testing and proposals described by said company are
inadequate to determine effective "near field" noise levels
to sensitive HF band receivers. Additionally, they do not
account for effects of "near field" high EIRP HF/VHF
transmissions introduced into the system.
Therefore this proposal is out of the question in my opinion.

Sincerely,

Thomas M. Walsh
A.R.S. W2CO
GROL PG-GB-029372