Sirs:
In reference to the proposed BPL technology:

I oppose the implementation of this technology for the following reasons:

1. At the propose signal levels it appears as though this system would emit RF signals into the surrounding areas in excess of 200 uV/meter. considering that a great many communications devices in the frequency ranges proposed have sensitivities of less than 1.0 uV, the radiated energy of the proposed system could very well overload the receiver RF amplifiers of every HF receiver in the vicinity of the power lines carrying these signals.

It occurs to me that this is not a good thing. I believe this would have harmful effects on not only the Amateur Radio community doing what they do best, that is providing our nation with emergency communication during times of need, but it could very well hamper the ability of our Military who use extensive HF communications for both operational and Search and Rescue missions.

As both of these groups have a distinct and valuable service to perform in our ongoing Homeland Security efforts, I believe their ability to perform outweighs any need for the aforementioned technology.

2. Power lines, at the frequencies proposed, are spaced such as to prevent any cancellation of the emitted signals, and in fact may in some places be spaced so that the lines themselves may act as a resonant antenna and actually provide an effective gain to the signals, thereby increasing their coverage. These 'antennas' would have a radiation pattern at roughly right angles to the lines making it difficult if not impossible to get away from these signals should BPL be launched throughout the country.

Again this would have devastating effects on any institutions and/or communications groups trying to use the HF spectrum.

3. Power companies, in general, seem to have a poor record in correcting complaints of unintentional interference as witnessed by the FCC letters issued virtually very month instructing these companies to comply with Title 47 part 15 regulations. There is no evidence to show that these same companies would increase their willingness to cooperate with the RF communications community if given what appears to be a license to spread massive HF interference intentionally.

4. Studies in other countries have shown that the harmful interference created by the the proposed BPL technology is so great that they have refused to permit it to be used.

I sincerely hope that the FCC commissioners will take a long hard look at this situation and not be overwhelmed by overstated promises and understated research presented by some manufacturers, but will take their data along with the data presented by the ARRL and consider putting this technology on the shelf until it has evolved into a non-interfering asset to the community as a whole.

As to my qualifications for making the comments above; I have been an electronics field engineer for over 30 years in several specialties including RF communications. In addition I am an Extra Class Amateur Radio Operator and am presently involved in HF/VHF antenna research and development.