

As an Amateur Radio operator the impact strong interference from BPL might have at HF and low-VHF amateur frequencies would in fact render our station useless. As a licensed station, many hours as well as hard earned money has gone into my hobby and my license. To offer a non-license system to occupy my bands running whatever they wish with full immunity is both unfair and illegal. We serve both the community and the state by providing needed emergency communications, assisting the National Weather Service and local police with search and rescue, weather reports from the field when needed and other needed communications during public events where additional community needs warrant.

Electric utility companies will operate many, if not most, BPL systems. These persons are both un-trained and un-licensed as radio operators. Past experience dealing with power line interference and utilities' responses to complaints can best be described as useless!

Amateur Radio is a valuable resource that must be protected. Our history of public service is well documented and continues to impact our community as is evident by current events in our country.

The present FCC Part 15 limits for this technology already can result in substantial interference potential to amateur frequencies, to further this will result in even more. We will have no protection under our license to prevent or combat them.

BPL systems that radiate on wide swaths of spectrum and that occupy entire neighborhoods have greater interference potential than localized systems, such as switching power supplies or electric motors. Health problems too resulting from this use of BPL is not known as well. What other forms it will take on TV, Cable and current DSL is also in doubt..

The FCC has promised to protect licensed users of the spectrum. We hold you to that promise. As licensed operators we reject any proposal which would cause our loss of use of our bands.

BPL systems use overhead medium-voltage wiring, with digital "repeaters" installed every 2000 feet or so along the way. This widely spaced, unshielded wiring radiates a strong BPL signal to nearby areas. Still other BPL systems use IEEE 802.11-protocol wireless equipment to make the connection to homes and businesses. Both cause excessive radiation to all forms of devices and to Amateur Radio.

In the case of access BPL, if an amateur doesn't have the broadband system installed in his or her own house but experiences interference from signals radiated via the overhead electrical wiring, the only real solution could be to turn off the BPL system in entire neighborhoods. As a practical matter, that is unlikely to occur. We will have no recourse!!

What will happen when amateurs operate their stations in areas where BPL is deployed? The ARRL recently petitioned the FCC for a tiny amateur LF allocation in the vicinity of 136 kHz. The

electric utility industry claimed in comments on the ARRL's petition that its PLC devices--operating on an unlicensed basis on frequencies below 490 kHz--would suffer harmful interference from 1 W effective isotropically radiated power (EIRP) amateur stations. The FCC agreed and chose not to grant Amateur Radio the LF allocation it sought.

Yet the same utility industry, in consortium with BPL manufacturers, is making the claim that on HF and low-VHF--frequencies where power lines make better antennas than they do on LF--BPL signals can coexist with amateur stations that may be running more than 10,000 W EIRP.

Hams are generally very concerned about immunity, because we understand and appreciate the social problems that might result when a neighbor's broadband access doesn't work because the amateur is on the air.

One technical issue involves the best method to bridging or bypass the typical step-down pole transformer to deliver BPL from the power grid into an office or dwelling.

BPL will cause us to lose as licensed operators, have no recourse when issues arrive and no protection under the law. Vote NO!!