

I strongly oppose any decision that would relax rules and regulations regarding Broadband Power Line carrier-current systems.

While it may be true that these systems are currently allowed under the current rules, they are not widely deployed because of the cost associated with developing systems that would adhere to the current rules.

First, power companies should be required to do what they do best: generate and distribute power. They have no expertise in the business of internet access. I do not feel that BPL would lower my Internet access costs by adding competition- in all likelihood, this type of system will fail and the costs will be passed along to the consumer by higher electric bills.

Second, as an active Amateur Radio operator, I feel very strongly that BPL will cause significant interference to your current licensees in the Amateur Radio Service. The 3-30 MHz band is already filled with significant interference from current Part 15 compliant systems- even with no antenna connected to my HF receiver, I can pick up broad swaths of interference every 15 kHz starting at the television color burst frequency of approx. 3.5 MHz. This interference comes from every television set in my neighborhood, some even if they are turned off. And 90% of them are utilizing cable TV.

Adding BPL to this mess will start to make the HF radio spectrum unusable for normal shortwave communications.

I am the Radio Officer for the Monmouth County, NJ Radio Amateur Civil Emergency Service (RACES), as well as the District Emergency Coordinator for our Amateur Radio Emergency Services group supporting the Red Cross, Salvation Army, and county Office of Emergency Management and local National Weather Service office. Added interference from deployment of carrier current systems would make emergency communications difficult or impossible in many situations. Additionally, it very well may force many amateur radio operators off the air- especially in condo and apartment complexes. We need these amateurs during a disaster.

I operated a carrier current AM radio station while in college. I served as both Chief Engineer and General Manager of WFDU-AM. I have direct experience with carrier current systems as an Electrical Engineer. And while I don't have actual test results to prove it, I do know that carrier current systems both generate and are subject to tremendous amounts of interference.

I have no confidence in the electronics industry to produce quality components for a BPL system- eventually they will produce miniature, inexpensive components with poor filtering that do not fully meet FCC regulations- our stores are full of television sets, stereos, telephones, and radios that fall into this category at the moment. Sure, the prototype submitted to the FCC as Part 15 compliant meets or exceeds specs- the mass produced model probably does not.

Lastly, what happens when a single amateur radio operator who is experiencing interference from a BPL system is the only person

holding up deployment to an entire neighborhood or town? Will the FCC stand behind its licensee and enforce strict non-interference rules? What happens when the BPL system produces interference, even though it is operating properly and within emission standards? Will it be shut down (since it is not supposed to produce interference) even though the power utility has spent thousands of dollars to build the system in that area? Or will the amateur just have to "put up" with the interference?

These are questions the FCC must ask itself, not commenters, as only the FCC knows what it intends to enforce.

I am also a computer network engineer and have worked as an engineer at an Internet Service Provider (ISP). I do not feel that BPL is a viable method of Internet access because many areas of the United States currently have broadband access. Despite the choices (DSL vs. cable modem), most consumers go with a single system in a given area. In my area, very few people use DSL- most have chosen cable. Adding a third choice here would be a waste of money.

I hope the commission will either not modify the current BPL rules, or create stricter rules governing interference caused by systems such as this.

Regards,
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