

Reference: ET Docket No. 03-104

Ladies and Gentlemen:

I would like to respond to your request for comments regarding the need for regulation of Broadband Over Power Line (“BPL”) technology, should it be deployed throughout this country on a widespread basis. My comments are prompted as a result of the likelihood that BPL systems could potentially produce substantial interference within the 2 MHz to 80 MHz frequency range.

The amateur radio service, currently a primary user of various frequency segments within the HF and low-VHF spectrum, is a major source of communications support during times of natural disaster or other civil emergency conditions. This was most recently confirmed on June 21, 2003, when Michael D. Brown, Under Secretary of Homeland Security for Emergency Preparedness and Response, announced an official affiliation between the American Radio Relay League (ARRL) and President Bush’s Citizens Corps. The ARRL is a non-commercial membership organization of radio amateurs organized, among other reasons, for the purpose of providing communications services in the event of disasters or emergencies, and for the advancement of the public welfare. It is the principal organization representing the interests of some 650,000 licensed amateur radio operators in the United States.

In a June 21 press release issued by the Federal Emergency Management Agency (FEMA), Under Secretary Brown said . . . “The affiliation between Citizens Corps and the American Radio Relay League will help raise public awareness about public safety through the use of Amateur Radio.” From this, it is clear that the amateur radio service represents a significant homeland security resource, whose communications capabilities must be ensured.

The Commission has an obligation to protect amateur radio service, and other primary services that are allocated HF and low-VHF spectrum space, from interference that would jeopardize the ability of these services to communicate effectively. Unless the Commission acts to impose appropriate regulations upon BPL service, interference resulting from HF and low-VHF radiation from BPL systems has the potential of rendering amateur radio service in some areas unusable. In times of national emergency this could lead to potential loss of life and property, a situation, which I am sure, the Commission does not wish to inadvertently facilitate.

Even though the Commission has recognized the potential public benefits of BPL technology, it must honor its higher obligation to protect current primary users of spectrum in the 2 MHz to 80 MHz range by establishing realistically restrictive regulations upon BPL systems in this country that will prevent the generation of excessive interference.

Respectfully,

Myron W. Manker