

I am writing to voice opposition to the opening up of power lines for Broadband over Power Line (BPL) communication. The method has been tried in other parts of the world and found to produce unacceptable levels of interference to other radio services.

Military, emergency services, aviation, and amateur radio services all operate on bands which could be adversely affected. For example, in my county (Caribou, Idaho), the emergency services department communicates with other similar county offices in Idaho and with the Federal Emergency Management Agency (FEMA) on a range of HF frequencies. These frequencies, which have been allocated by the FCC, would likely be clobbered by BPL.

As you may be aware, under the right conditions, very little power in the HF bands is needed to produce strong signals at locations continents away. This is why the Citizen's Band service channels, particularly channel 19, are a constant cacophony, even though power levels are limited to a maximum of 5 watts, and even though the CB bands are legally restricted for local communications. Similar troubles will likely occur in other HF bands, which will ebb and flow with diurnal and solar fluctuations in propagation. HF communication depends upon propagation conditions being good, and BPL is likely to fill the bands with noise whenever they are good, wiping out HF communications.

The FCC has a responsibility defined by law to protect licensed services from interference. I have a personal interest in seeing that the effort applied by volunteer and professional emergency communications specialists not be wasted on account of interference. Amateur radio, a frontline service in emergency situations, also has bands would experience interference. Persistent strong interference on the amateur bands will result in declining numbers of qualified amateur operators, and deplete the pool of operators available for emergency communication.

As an electrical engineer, I am certain that there are alternatives to BPL. The commercial interest in the expansion of communication methods and band spaces will certainly motivate better technical methods than BPL. I see no reason to rush into the use of BPL.

Thank you for your consideration.

Max Nielsen