

To whom it may concern:

I have read with interest a number of articles concerning PLC, or BPL (broadband over power lines). I have also listened to several recordings made in Japanese trials of this technology. The following are some observations and comments on possible impact on HF and low VHF communications.

1. The type of broadband noise generated in the recordings swamped what sounded like s7 or s8 signals on the shortwave bands.
2. This type of noise is not the pulse type of noise which most analog noise blanking circuits I have encountered will reduce.
3. From what I have read, this interference will be present over large areas of the HF and low VHF spectrum from 1.7 to 80 MHz. This could render all amateur bands from 160 through 6 meters nearly unusable.
4. Since this noise will be carried over building wiring, as well as aerial and underground power distribution lines, it will be impossible to escape its effects.
5. If I recall correctly, the power companies opposed an amateur allocation at 136 KHZ because it would interfere with their current carrier current communications used to monitor the power grid. This allocation had a power limitation of only a few watts. Why then, would they wish to use areas of the spectrum heavily populated with stations running from milliwatts to megawatts.? The last refers to shortwave stations both in the U.S. and abroad?.

OBSERVATIONS ON IMPACTS

1. The amateur service currently fills a valuable role in emergency communications. Why would one wish to compromise this service by covering their spectrum with high levels of inescapable interference?
2. Other users of the HF spectrum will also feel these effects. Users of the fixed and mobile services, aeronautical users, the "citizen's band" military users, and commercial broadcasters will all have to contend with BPL interference.
3. Other means of access to the internet currently exist. While not present in all areas, cable modems, satellite services, and ADSL exist. In my area of the country, (east central Indiana), cable modems have been available for five years. However, Ameritech introduced ADSL only in December 2001. I live in a city of approximately 100,000 with a large university and hospital. Both foster a highly educated population which according to all statistics I have read is much more likely to want and use broadband services. However, Ameritech did not see fit to fill this need, and now are crying about not being able to sell ADSL. I went through the same scenario with ISDN in the early 1990s. When the phone company finally saw fit to make it available, it was

priced far too high for the average consumer; therefore, it didn't sell. This "foot dragging" on the part of the telephone companies, is a far greater deterrent to the spread of broadband services and should be addressed before creating a new threat to HF and low VHF communications.

CONCLUSION

I am an amateur radio operator with an interest in low power communications; (QRP). I do this for several reasons.

1. It reduces the likelihood of interference to my neighbor's electrical devices.
2. Running low power reduces RF exposure for myself and others around me.
3. I am totally blind, and therefore am uncomfortable around high voltages and currents. Low power reduces the likelihood of injury to myself and damage to my equipment.
4. Finally, part 97 states that amateur operators must use "the minimum power necessary" to accomplish the communication. This fundamental principle is undermined by permitting such large and prevalent levels of noise over wide areas of the radio spectrum.

I hope you will give serious consideration to these and other comments filed by ordinary amateurs and other current users of the HF spectrum.

SINCERELY,
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