The FCC has a historical regulatory mandate from the United States government and the people of the United States to protect licensed users of the radio spectrum. It is incumbent upon the Commission to place this task highest in any regulatory proceeding.

Amateur Radio has proven itself many times to be a valuable and irreplaceable resource to both the people of the United States and the government of the United States. This has been proven many times in the past few years. A couple of recent examples on the national level were when Amateurs volunteered to assist government officials in the recovery of bodies, evidence, and debris from the World Trade Center site. Even more recently, Amateurs assisted NASA with recovers of debris from the space shuttle Columbia crash.

It is the duty of the FCC to protect Amateur Radio, a licensed service, from interference from unlicensed services. BPL systems fall into this category. BPL systems have the potential to radiate on wide swaths of the RF spectrum and since they will occupy entire neighborhoods have a greater interference potential than localized systems.

Studies performed by the Amateur Radio Relay League suggest that received signal levels of BPL broadband noise at a typical amateur station would be anywhere from 33.7 dB to 65.4 dB higher than typical ambient noise levels in worst-case situations.

Existing FCC regulations state that below 30 MHz, intentional emitters are limited to a peak field strength of 30 microvolts/meter at a distance of 30 meters from the source. The legal limit of 30 µV/m at 30m will result in a strong signal to nearby amateur HF installations. As one example, on 3.5 MHz, a half-wave dipole placed in a 30 µV/m field will receive a signal level of –86.4 dBW (-56.4 dBm). This is a 338 microvolt signal in a 50-ohm system. Since amateur radio receivers are very sensitive, typically with a noise floor of –165 dBW (-135 dBm or 0.04 µV), this would represent an S9+16 dB signal.

There is also a good potential for interference to a BPL system from licensed amateur radio operations. According to the ARRL, there are "currently over 650,000 licensed amateurs in the US. About half of these are active on the air from time to time, and about half are sometimes on HF. This represents a significant interference potential for any unlicensed system that operates on HF." This would degrade the BPL delivery service to the consumer and make it problematic at best and totally unreliable at worst.

Based upon its studies, the ARRL concluded "BPL cannot be deployed using amateur allocations in the MF, HF and VHF bands without severely high interference potential."

I believe that BPL should not be deployed! There already exist multiple methods of delivering high speed networking to the home user with much better reliability and much less risk of interference both to the consumer and to pre-existing licensed radio services.

Thank you,
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