Dear Sir or Madam,

I would strongly encourage the FCC to resist the special interests pressing for adoption of methods of Broadband over Power LInes (BPL) outlined in this NOI.

It seems to me that there could be nothing more ubiquitous and disrupting to terrestrial radio communications then what is being proposed here; nothing short of solar flares and geomagnetic storms.

Spurious radiation from discrete points on the power lines across the nation is already the bane of the commercial and amateur radio operator. To think that we are going to add an ever present, ambient level of noise radiating from a continuum of points on those same power lines is unconscionable.

Granted that modern software and fast computers can model electromagnetic environments today. But I submit that we probably can't conceive of all the configurations and opportunities for energy radiated from the sprawling power line network to adversely affect radio communications.

Shall we return to the days of spark gap transmitters? Or a system of equipment simulating that in modern form? Heaven forbid. I think not. What we called progress over the past hundred years was learning to move from the broad band smear of energy involved in moving the bauds and bits from one point to another to narrowband methods of modulation and efficient use of spectrum; all that to constrain the risks of interference. And where radiation and wireless systems were inappropriate, we laid cable and confined the energy to those cables.

I understand that the power companies have used BPL methods for their own system controls. But that certainly doesn't establish a precedent, for the unprecedented volume of traffic and area of coverage required for the modern Internet System. Such background is not "carte blanche" to broadened application.

I believe that it is incumbent upon the proponents of BPL to demonstrate that in every circumstance, in every imaginable installation, they will not produce interference to any existing system of radio communications greater than that presently experienced from atmospheric or thermal noise sources. A BPL interference level should be set at 10 to 20 db below naturally existing interference sources. Until compatibility can be demonstrated to the degree described here, the BPL system should not be allowed to proceed beyond experimental status.

These comments are respectfully submitted by,

Ralph J. Crumrine
Crumrine Consultant (retired)
1621 E. Sunvale Drive
Olathe, KS 66062-2108
913-764-3380
913-764-8856 FAX