

The following is a set of reply comments from Andrew Leeds, an Amateur radio operator and electrical engineer, to the comments submitted by UPLC.

In their comments UPLC states that “there has been no interference reported in any of the field trials by its members.” This statement in and of itself does not satisfy me that interference will not result from the widespread deployment of BPL. The UPLC does not comment if these trials were conducted in areas that had other licensed services, such as amateur radio stations, in close proximity to the trials or that these other services were operating during the time the trials were conducted. Testing for problems by waiting for the phone to ring with complaints has proven ineffective many times in my professional experience. There may indeed have been interference in the trial areas that was not reported or that the victim attributed to other sources and has of yet not traced the root cause (or may not be technically competent or equipped to do so). It would be far more informative to have contacted HF spectrum users in the test market and conducted both empirical measurements and qualitative studies of the effects on HF spectrum in these test markets and provide those results for review and examination by the Commission and other interested parties.

With respect to the market considerations outlined in Section IIB of UPLC’s comments, in particular the percentages of zip codes not served by broadband, I believe that the market is dictating this condition rather than a lack of technology or interested service providers. When broadband service is deployed to an area there must be a significant number of potential subscribers to justify the cost associated with building the infrastructure. In this respect power companies are no better off than telephone or cable companies in many situations. The BPL provider would still have to have enough potential customers to be reasonably certain they would recoup the cost of the infrastructure equipment. In many of the rural areas that I believe account for the large majority of the zip codes without broadband access this calculation would not be any more favorable for the BPL operator than it is for phone companies, cable companies, or other existing broadband providers. In addition to these issues the base figures of service coverage cited by UPLC have no doubt changed since they were collected as DSL and cable broadband continue to expand rapidly and serve those areas previously not covered.

Respectfully Submitted,  
Andrew Leeds  
650 N Apollo Blvd  
Melbourne, FL 32935