

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of ET Docket No. 03-104
Inquiry regarding Carrier Current Systems,
Including Broadband over Power line Systems

Reply Comments to:
American Public Power Association, July 28, 2003

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Limited Technician.

As a licensed Amateur Radio Operator, holder of a General Radiotelephone
Operators License, and a professional Data/Voice Network Support Analyst, I am
very
concerned about the ramifications of BPL, not only for the serious interference
to licensed HF and low VHF services, but to the data integrity of BPL itself and
to the potential impact to incumbent data and telecommunications services (ie
DSL, CATV, POTS, etc.).

This is a reply to the comments submitted by American Public Power
Association, an association clearly in favor of implementing BPL on a wide
scale, especially
in rural-remote areas of the United States. One comment in particular: "Further,
to the extent that interference is demonstrated, there should be an attempt to
accommodate BPL even if it means that existing communications providers may have
to share or transfer bandwidth".

The above comment suggests that existing communications providers to share
or move to different frequencies, this seems contrary to existing F.C.C. rules,
especially since BPL operates under Part 15, and that licensed services may have
to move. This shows a lack of knowledge of F.C.C. rules on the part of A.P.P.A.
Such a scenario would be extremely difficult, if not impossible since many HF
frequencies and services are internationally allocated. Tremendous hardships
would
be encountered by such services as amateur, fixed, mobile, aeronautical, military
and government, and marine.

Additionally, since BPL utilizes frequencies up to 80Mhz, television
reception could be affected, especially VHF channels 2-5 in areas where the
picture
quality is less than a "grade A" picture, a common situation in rural areas. In
terms of interference to incumbent HF users, I support reply comments made by
Ashley Lane, WA1ICN as to the extent of interference.

As a professional Data/Voice Network Support Analyst for twenty years, I
have worked with a wide variety of voice/data network backbones including
all baseband ethernet platforms, CATV based networks, dial-up and high capacity
telco networks, fiber-optic networks and wireless backbones. Based on
my experience, I question the reliability of a BPL network when faced with
external interference (such as from licensed HF users) and interference caused by

power line components (such as arcing insulators). While the A.P.P.A. suggests that proving interference should be imposed on challengers, we need an unbiased approach to testing with input from all affected parties. Incumbent services, such as POTS, CATV, DSL, etc should not be adversely impacted or be forced to accommodate BPL, such a Scenario is contrary to competition and consumer choice.

Respectfully Submitted

Robert E. St. Amant N0AXK.