

To: The Federal Communications Commission

From: Patrick Barkey  
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Re: Comments on ET Docket 03-100 (BPL)

I am strongly opposed to the use of so-called BPL technology that envisions use of the HF spectrum, in conjunction with other technology, to extend the broadband network via power lines.

I am thrilled with the progress of technology regarding the usage of power lines to carry digital information. The story of meeting this challenge is similar to the story of challenges met by the men and women in the amateur radio service, who have repeatedly turned what were once seen as irrelevant or useless resources (such as satellites, packet radio and the HF spectrum) into vital, thriving assets, well in advance of the commercial interests who later fully exploited their potential.

There is an important difference, however.

The resources that would be consumed by the usage of power lines as part of a broadband network, namely, the 4.5 to 21 MHz portion of the HF spectrum, are already in use by licensed, valuable, and fully compliant members of the amateur radio service (and other services). It is as if someone walked into your office and thought of something very useful to do with the chair that you happen to be sitting in!

From the NOI, the Commission is fully aware of the reasons for limiting the usage of power lines for broadcast as codified in Part 15. In terms of the polluting impact of the use of 4.5 to 21 MHz spectrum to conduct BPL, absolutely nothing has changed. Indeed, given the widespread penetration of internet in households, the pollution to the spectra today is, if anything, greater than when Part 15 was crafted.

What has changed is the vision of the Commission as to its role in the development of the communications infrastructure. The spectrum is a public resource, and we expect the Commission to manage it in our interests. The amateur service has provided decades of selfless service, technological innovation, and continues as an important stepping stone for those who will be the technology and communications leaders of the future. Our privileges granted to us in the HF spectrum, as recognized internationally, are vital to the maintenance and growth of the valuable asset that is amateur radio.

We do not expect the Commission to be a champion of any individual causes, at the expense of others. The extension of broadband networks is important, but to the extent that it impinges or destroys spectra that already serve a valuable function, it must be managed – not promoted.

Our allocation, having been granted to us, cannot be “double-sold.” Yet that is precisely what the usage of BPL in the 4.5 to 21 MHz spectrum would do. The Amateur Radio Relay League and others have vividly demonstrated the devastating impact that this pollution would cause to our legally granted usage of our frequencies. Does the mere feasibility of this BPL technology justify the trampling of their previous use?

I think the overwhelming evidence of public attitude in this and other areas says no.

Are we clearing the sidewalks of pedestrians so that the gyroscopic scooters can transport their passengers without impediment? Are we clearing existing neighborhoods to allow supersonic jets to access airports? Technology would allow us to do these things, but at an unacceptable cost to existing users. Intelligent management of these resources has brought about this result, and if the Commission employs good management in this situation, it will not grant the use of HF spectra to extend broadband service via power lines.