

In the matter of Broadband over Power Line (BPL) I must advise to the Commission that rulemaking in favor of this will have severe impact on radio reception of all types. I can speak from experience that the power companies I have used for the past fifteen years have very little desire to repair faults in their system, except gross outages. And a willingness to address problems is very important to share the spectrum, assuming the expected interference would be minor. Much like leakage of signals from cable tv, the BPL would have those problems as well. But the impact to the RF environment, from BPL, takes place in spectrum that is often, now, regarded as junk spectrum, but to some Americans, it is priceless.

I speak of the Amateur radio community, but even the general RF type hobbyist, like shortwave radio listening, and even users of AM radio. Please keep in mind that the signal levels under most circumstances that these people have come to expect as usable are in the microvolt per meter range, and maybe a bit higher. And some users are on both sides of that figure.

In an ideal world, the service will not radiate. My experience, as I'm sure yours has been, is that this is not an ideal world, and leakage will be a problem. We don't see enough information now to know how bad this will be. But I refer back to my original comments about power distribution companies.

From 1992 until 2001 I lived in Colleyville, TX, served by TXU Electric. As a "ham" radio operator, I was dismayed when I initially began to receive massive interference from power lines, due to old hardware on utility poles, etc. It was so intense that I could not watch the tv station I was chief engineer for, a low VHF channel (5). I complained to TXU, they sent out a RFI specialist, and he located the fault, and in three days it was fixed. Good ending, but short lived. Over the years I lived in Colleyville, I had this problem four times. By the last complaint, in 1999, I had to repeatedly call for help, the same specialist paid a visit after six weeks of calling, and told me that it may be another six weeks before the problem would be repaired. It seems that TXU had trimmed the number of repair people, that's usually a financial decision, and he said it was taking, at that point about six weeks to fix problems, and some things that would have been repaired in earlier years now would go without the needed repair.

So my concern here is that the Commission is proposing a service that almost certainly will radiate energy, and broadband energy at that, which will be installed, owned, and maintained by various companies that really don't care to keep their plants in good condition, but rather in serviceable condition. And with the wide area of deployment, eventually nationwide, the FCC comes nowhere close to being able to police this, or act as arbitrator in interference disputes. And I do paint the Power industry with a broad brush here, but I feel it is warranted.

I strongly advise the Commission to not let this genie out of the bottle. Many people will suffer the consequences, and a select few will benefit. A better idea would be to make conditions better for deployment of wireless broadband, such as the "700Mhz" spectrum uses. Then rural areas can get "Broadband" and nobody receives

interference.