

I am opposed to BPL deployment in any form and the waiver to increase the Part 15 limits on radiation. Although the FCC may consider BPL to be a breakthrough technology that can bring broadband access to the masses, it is not without serious consequences. There are other viable and non-interfering technologies that would allow broadband access. The technology of BPL, if deployed perfectly in an ideal environment, at best would still cause interference to all services in the HF spectrum. But we live in a real world. Imperfect installation, unbalanced lines, and other real factors such as mismatched impedances, will cause significant radiation of interfering signals. Radio receiver front end technology over the years has lowered the minimal discernable signal (MDS) level to new levels, making communication possible over distances and with propagation not possible decades ago. BPL would cause interference at levels much greater than MDS. Communication at those levels would be unusable with BPL deployment, throwing away decades of advancement.

Amateur radio operators around the world have demonstrated the ability to communicate with low power milliwatt transmissions. The radiation from BPL, as shown in the real world tests that I have seen, is many orders of magnitude stronger than these transmissions and would effectively render HF communication useless. The long horizontal power lines that BPL utilizes would act as a long wire antenna, broadcasting interference throughout the HF spectrum, disrupting communications not only from amateurs, but government, DOD, commercial and safety organizations.

I strongly urge the FCC to reject any BPL deployment and to not alter the Part 15 regulations to accommodate this special interest