

Aug 8, 2003

Subject: Docket 03-104 (Broadband over Power Line Systems)

Dear Commissioners,

I am writing this response to express my concern about the proposed deployment of Broadband over Power Line (BPL) systems. Having read a number of comments submitted by proponents of such a system, I was surprised to see claims that no interference to other services was reported. My experience as an electrical engineer lead me to expect that there would be substantial radiated signals in any real-world test setting. In fact, this was shown to be the case by tests done by the American Radio Relay League (ARRL) and submitted in their comments to this docket.

It is well documented that there are many devices that do in fact produce harmful interference while still being in compliance with Part 15 regulations. Fortunately, they are used by a relatively small portion of the general population. The BPL systems being proposed would be all-pervasive and thus swamp the frequency spectrum with noise. Consumers will buy this equipment with the expectation of trouble free operation, and then find themselves the target of interference complaints and also the victims of interference from licensed users of the frequencies involved.

The claims that interference issues can be adequately dealt with via the existing Part 15 rules is highly unlikely. The utilities have a terrible record of dealing with interference complaints regarding their current systems. Deploying BPL would require large investments in training, equipment and manpower for maintenance of the system and handling interference issues. To date, the whole concept seems entirely foreign to the utilities. The comments submitted by system proponents never address these issues in the rosy economic picture they paint.

The FCC is correct to exercise caution with regard to deploying these BPL systems. The field studies sponsored by the proponents of this technology have been entirely inadequate to accurately assess the impact that these systems would have. Extended studies should be performed with the current spectrum users being informed that such a trial is underway. A common theme in the comments submitted seemed to be that only proponents of the BPL systems were involved in the trials.

In conclusion, I strongly oppose the deployment of BPL systems. The power utility system was never engineered for such a use and is entirely unsuited to such a use because of the harmful interference it would cause to other frequency spectrum users. The FCC has for years refused to allocate frequency spectrum to new users near the frequencies that are currently used by the PLC (Power Line Carrier) systems for just these reasons. The FCC should continue to protect all users of the frequency spectrum from this new source of noise pollution.

Sincerely,
Charles Hartley

