

Position Statement:

These comments are filed IN SUPPORT of the ARRL position which is IN OPPOSITION to the organizations and businesses wishing to use HF and Low VHF radio frequency bands to deliver broadband over power line (BPL) services.

Summary:

After studying many video tapes and data collected from BPL test sites in the US and abroad, it is my opinion the HF AND Low VHF radio spectrum would be made useless by spectrum pollution from BPL systems. It is my wish that the Commission deny deployment of BPL systems in the United States and US Territories as the telecommunications authorities in Japan and Germany have already done. The HF spectrum is far too precious to be squandered by those wishing to offer BPL services.

Supporting Facts:

Field Trials:

As the Commission may be aware, many incumbent user groups have attended BPL field trials through out Europe, Japan and the US. All have returned with the same comment. BPL cannot coexist with any licensed user of the HF and Lower VHF spectrum due to the effluvial nature of interference generated by the BPL system. In the US, Mr. Ed Hare of the ARRL drove through areas where BPL is being tested, covering nearly 1400 miles. Mr. Hare's video showed the field strength meter of an HF transceiver holding steady in excess of S9 while under the influence of a BPL signal. The transceiver's speaker emitted such a caterwauling that even the strongest amateur signal was partially masked. Of course, the weaker signals were inaudible; having been buried by the BPL signal. What is really surprising is the BPL signal was only somewhat attenuated in areas served by underground utilities!

Mr. Hare's data is in line with that from Europe and Japan, supporting the existing spectrum user's position that BPL would irreparably and irreversibly harm the incumbent licensed services of the affected spectrum. This data flies in the face of those groups wishing to provide BPL services, as these groups have told the Commission there is no interference potential from BPL services. In fact, one of these groups; the American Public Power Association, in its comments to the Commission, put the burden of proof on the users to demonstrate the potential. It is my opinion and belief, that the data gathered at BPL field trials around the world does just that! This

data proves that BPL, if widely deployed, will be the worst source of man made interference to the radio spectrum in the history of the world.

Other Problems:

If DSL or cable hasn't been rolled out to rural areas what makes the Commission believe BPL will? After all, BPL is used in the last mile. In fact, it takes three BPL "relays" to equal the range of one DSL circuit. It's really pretty silly considering an individual or business wanting broadband in a rural area can have it NOW with satellite anywhere or wireless services in many areas. It's worth noting that Third Generation (3G) Cell phone service is being rolled out in many areas of the US.

The Best Solution:

Of course, the best way to provide broadband service to the home or business anywhere is with fiber optic cable. Fiber Optic cable already exists along many intermediate power and telephone lines. Why not mandate the use WI-FI for the last mile until Fiber to the home (FTTH) can be rolled out?