While broadband Internet access is important, there are manytechnologies that can deliver it without resorting to Broadband over Power Line (BPL). At the same time, there is only one technology that can provide the wide area point-to-point (with no dependency on infrastructure) communication that is provided by the HF and low VHF radio bands. These bands are used by the amateur radio service, and other services, that have a long and well documented history of providing protection to life, liberty, and property in the most dire of emergencies and disasters. There simply is no other technology that can provide the world-wide infrastructure-independent communication that HF radio does.

Even for the best-case scenario in which the HF band interference due to BPL is minimal, it might still destroy the value of the amateur service. The homeland security benefit of the amateur service derives not only from the wide-area infrastructure-independent nature of the HF propagation, but also from having a standing army of dedicated amateur radio service operators with working equipment and regularly practiced skills. If the band becomes unpleasant to use, it will not attract new operators, and the existing operators will become unpracticed or even give up altogether. I believe that risk is too high.

If this reasoning is not compelling enough, please also consider that the bandwidth available from BPL deployment may seem like a lot, now, but it can not scale for the future. Sacrificing the HF band will give us a theoretical data rate forever limited by Shannon's Law. The streaming media and remote storage applications have an insatiable thirst for bandwidth that will soon outgrow the best BPL can offer. Trying to meet the growing demand will force BPL providers to deploy modems closer and closer to customers. As they do, the economic model will fail to be competitive with alternatives such as optical fiber, OFDM, coaxial cable, and others yet to be invented. BPL does not offer enough value to justify the risk of interference with established critical services.

Respectfully,

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