

In the matter of ET Docket 03-104 regarding Broadband over Power Line

These comments are submitted by Steve A. Courts, radio amateur licensee K8JQ and licensed professional (electrical) engineer in the state of West Virginia.

A number of comments by proponents of BPL have advocated positions to which I offer the following comments in response.

1. Proponents suggest that BPL will make broadband service available for nearly every home and business in the nation.

My response: Any type of broadband service requires infrastructure. So will BPL. I suggest to the Commission that the reasons for which cable and DSL broadband services are unavailable in various areas of the nation will in general be impediments for BPL: Population density, and thereby revenue, do not justify the expenditures for infrastructure.

2. Proponents of BPL suggest that existing commission-licensed users of the 2-80MHz portion of the radio spectrum will suffer negligible interference from BPL.

My response: Field measurements (of trial BPL systems) conducted by the American Radio Relay League (ARRL) indicate substantial levels of interference to amateur radio users of the 3-30MHz spectrum. Users of the balance of the portion of the spectrum under question will likewise suffer.

Further, power companies are notorious for failing to control their facilities' wide-band radio spectrum pollution, facilities which were designed neither to generate nor radiate energy in the radio spectrum. It is beyond the pale to conceive that these same companies will effectively control the levels of radiation of electronic equipment designed specifically for the purpose of generating energy in the radio spectrum.

3. Proponents of BPL make much of the potential for improved service to customers of electric utilities.

My response: Equipment and techniques exist today which can be deployed to achieve these noble and lofty goals. FCC rule making is not required. BPL is not required. If these goals are important to the electric utilities, then let those goals stand on their own merit.