

FILING TO THE FEDERAL COMMUNICATIONS ON PROCEEDING 03-104

I am an Amateur Radio Operator (KS4VB) and a Mariner (WCG2968) and an avid user of the Internet in my marine repair business. I understand that Broadband Over Power Lines (BPL) is the only system that shows the potential to deliver universal broadband Internet access to a vast majority of the population in the near future. I also understand that the proponents of BPL claim that this system does not create radio frequency pollution and therefore does not interfere with other license holders. I have seen data that shows that this claim is false.

American Radio Relay League Lab Manager Ed Hare, W1RFI, equipped his vehicle with monitoring equipment and drove through areas in the Northeast where BPL is being utilized. Here is a quote from his report (I have added the emphasis):

"The interference found ranged from moderate to extremely strong," Hare said. The video shows the S meter of an HF transceiver holding steady in excess of S9 as the speaker emits a crackling din, which one observer described as sounding like a Geiger counter. Only the very strongest amateur signals broke through on 20 and 15 meters. **Hare noted that the field strengths of the various systems all were within FCC Part 15 limits for power line carrier (PLC) devices.**

The video he refers to was taken during the survey and it can be viewed here:
<http://www.arrl.org/news/stories/2003/08/08/2/?nc=1>

What he found was an environment that was so polluted with radio frequency pollution that communication via amateur or shore based marine single sideband would have been impossible to achieve. And this with the BPL system operating within the FCC Part 15 limits for PLC devices. Based on this information, it appears to this operator that the FCC Part 15 limits are currently too high for PLC devices and, if BPL is widely implemented, reasonable accommodation for Amateur and Marine Single Sideband radio will not have been made

BPL technology in its current form is flawed technology. If implemented, BPL will disenfranchise Amateur Radio Operators and render their valuable emergency support useless. It will also eliminate the shore based components of Marine Single Sideband operation which will cause an economic hardship on all concerned.

I request that you cease and reconsider your current course of action regarding the deployment of BPL and other PLC systems and develop a spectrum utilization plan that will accommodate all users and not disenfranchise any.

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