

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

**INQUIRY REGARDING CARRIER
CURRENT SYSTEMS, INCLUDING
BROADBAND OVER POWER LINE
SYSTEMS**

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ET Docket No. 03-104

To: The Commission

COMMENTS OF Frank J. Dziurda – K7SFN

I would like to thank the Commission for this opportunity to express my comments and concerns regarding the potential deployment of Broadband Power Line Carrier technology.

As an engineer working a power company, I have had the opportunity to design and install narrow band frequency shift keying (FSK) power line carrier systems. These systems, using discreet LF frequencies, are used for control and protection of high voltage transmission lines and regulated by Part 15 of the Commission's Rules. Due to their design, they do not pose any significant potential to interfere with other LF, HF and VHF users. Power "transmission lines", by their nature, are generally point-to-point and "balanced", to provide the most efficient means to transfer energy over medium to long distances. Coupling of these LF discreet frequencies to HV transmission lines can be accomplished in a relatively efficient manner that tends to minimize actual radiation from the line. The use of LF frequencies helps to make this possible.

On the other hand, Broadband Power Line Carrier (BPL) would traverse a power company's "Distribution" lines. These lines, unlike transmission lines, are used to deliver power to their customers and generally speaking, the source of a majority of radio and television interference complaints received by power companys. Power Lines are designed to transport 60 Hz energy, not HF & VHF energy. At HF & VHF frequencies, distribution power lines would become a huge antenna system, radiating BPL RF energy.

If BPL were to become a reality, even meeting Part 15 radiation limits, I believe these systems would generate severe interference to other users in the HF and VHF spectrum. Amateur radio stations located anywhere near BPL systems would suffer very harmful interference.

Those individuals who compare existing power line carrier technology with the proposed BPL systems are not comparing apples with apples.

Because of these concerns, I would encourage the Commission to deny any consideration for allowing BPL to be implemented.

Respectfully Submitted,

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