I wish to express full support for the Comments submitted by the American Radio Relay League concerning Docket ET 03-104. It is clear that assertions by proponents of BPL are not supported scientifically and that while in individual instances a particular system may not cause harmfull interference, any significant adoption of BPL technologies would represent a composite threat to existing and critical communications that would certainly not be reparable.

I personally participate directly with broadband development efforts in the State of Michigan. I have testified before both House and Senate technology committies on the necessity of adequate service and the problems involved with acceptance of technology services and deployment. I participate on the steering committies of 2 regional "LinkMichigan" broadband development studies. I have also personally funded and built a state-wide commercial Internet service and currently provide critical connectivity and content services to businesses and organizations. While I appreciate the desire to see expansion of broadband services, BPL is not a technology that will properly solve these issues.

1. BPL technologies are unable to sustain the growth requirements of broadband services. While BPL may be an interim solution in certain situations, it is not sufficiently extensible for any significant time into the future. As such, the significant risk of interference to existing critical communications infrastructure is not offset by comprehensive solutions to the problem of broadband distribution.

2. Support of problematic interim solutions that do not extend well into the future dilute support of other technologies that do have that potential. Each customer served with BPL represents lost revenue that would support the development of solid and proven long term solutions that do not have the high level of risk represented by BPL.

3. BPL is effectivly a COST SHIFTING technology! The primary benifit of BPL is that it uses existing infrastructure and thereby significantly reducing cost, however, in doing so, BPL by it's very nature does direct harm to other services that will likely result in harm and COSTS to those services. It is important to view the entire impact of BPL rather than simply the direct aspects of BPL providers and customers. When all impact is considered, BPL is no longer a rational and overall cost effective solution.

4. Power providers should be encouraged to use rational and benificial technologies as opposed to shortcuts. Power providers represent perhaps the largest installed and maintained use of right of way and as such have a unique opportunity to deploy proper solutions based on fiber technologies. Such technologies are in fact extensible, do not cause harm to other services, and provide the best opportunity for long-term service and growth. Admittedly the initial costs are higher than BPL, but the overall benifit to society is considerably more significant than BPL could ever offer.

5. HF communications provide many critical services that benefit a wide range individuals and organizations. Examples are Air and Marine

communications, public emergency communications in rural areas, and the very important Amateur Radio Service and the many services associated with it. In particular, short-range HF communication is clearly the best option for restoration of communications in the event of situations that impact other commercial and public service systems. The receint power outage make the need to have supplimental communications that is not reliant on commercial power ever the more clear. Despite all hopes, cellular and public service communications systems failed in short order. Had that situation been further complicated by terrorism or extream weather, the situation could have had far-reaching personal and ecconomic implications. Short-range HF communications, particularly NVIS applications, can quickly fill this need and Amateurs are the sector that shows an ability to perform in such situation and regularly prove that time and time again. Any BPL deployment that jepardizes the contiued use and development of Amateur radio will directly impact this resource. Even though interference from BPL may not exist in a time of need, the Amateurs who would be able to serve may have long become frustrated and given up as a result of BPL interference.

6. It is the duty of the FCC to show leadership in the protection and use of radio spectrum. Activities by the FCC that dilute such a responsibility dilute the perception of all others. The FCC needs to stay at the forefront of spectrum protection, particularly when it comes to impact of over-the-air services by what should be closed systems. The FCC has show leadership in this direction with relation to Cable TV and Internet operators, but will be hard-pressed to maintain that leadership while offering safe-haven for other services that will certainly have significant impact on over-the-air communications. THE FCC MUST KEEP A CLEAR FOCUS ON WHAT IS OVER-THE-AIR SERVICE AND WHAT IS NOT!

7. There is no science that can eliminate radiation from BPL when broadband services are carried over exposed power lines. While it's possible to show that in some cases burried or otherwise shielded lines might be used without harmfull emmission, physics guarantees radiation from exposed lines that are not designed to serve higher frequencies. The FCC admits this in their own decisions to protect the low-frequency data transmissions power companies are already using on their systems. Any acceptance of BPL is a defacto acceptance of radiation and some level of interference to services. By providing that acceptance, the FCC sets up a situation where it is likely to be overwhelmed with compliance issues and borderline cases. If the FCC wishes to offer some acceptance toward BPL services, it should only permit that service consistant with scientific data regarding emmissions and therefore only where adequate shielding is provided to insure non-interference with over-the-air services.

I firmly believe and relate to the Commission that approval of BPL represents an acceptance of hazzard to critical services and a dilution of support for proper and correct solutions while offering only short-term solutions. I there for support the ARRL in opposition to ET 03-104.

Submitted with respect,

Charles Scott