

I am strongly opposed to the use of the power line grid for the transmission of wideband communications data. Everything I have read and studied indicates this will literally pollute the HF radio frequency spectrum in this country and essentially negate any practical use of the HF spectrum. This would include National Guard units which use HF communication frequencies, FAA facilities which use HF for communicating with international flights, and Amateur Radio operators, who not only use the spectrum as a licensed service, but also in the support of emergency operations.

Power line companies obviously see this as a way to add to their revenue stream. However it appears they are glossing over the interference problems which exist when the systems are put into operation. As a specific documented study of several such systems and the problems which occur, I refer you to the following. It is a very technically detailed study of the problem and I strongly encourage your engineering staff to read it to obtain a technical perspective different from that of the power line revenue driven opinions.

The articles are in two part series in the 2003 Annual Reference Issue of Compliance Engineering, Vol XX No. 3. The series discusses the actual field trials in Europe and the observations made on different technologies and the likelihood such systems will ever be compatible with existing users of the HF Spectrum.

From the conclusion of part 1; "... This strongly indicates unsolved technical problems with the present generation of PLC technologies. Peaceful coexistence with established technologies is currently unlikely. The technical problems are discussed in Part 2 of this article..."

From the second part of the article, there is a table of test results which shows that amateur radio communications as it currently exists will be rendered useless in the HF bands.

In spite of this technical disaster, the most disturbing aspect was the following observation. " The mighty PLC PR engine has been described in other articles. The stronger the technical problems became, the more money that went into promoting PLC, mainly at CEBIT in Hannover, Germany. Norweb, Siemens, EON, and RWE, meanwhile, all left the PLC scene because of the technologies unclear future. ... Generally speaking, there is very little willingness in the PLC industry to address technical aspects and problems even today..... However, it is important to note that 100 serious, technical, professional objections to NB 30 (some demanding even lower limits) were filed with REGTP and politically ignored by the Ministry of Economic Affairs when NB30 was released."

My biggest fear is the FCC will also act on this as a business initiative, which is inherently politically driven, rather than allocating and protecting the spectrum as they are chartered to do by Congress.