

I have read the comments filed on behalf of the APPA concerning BPL. As a professional Broadcast engineer and a licensed Amateur Radio operator I am concerned that serious consideration of BPL, at the current state of the communications art, is a step in a direction the FCC has never taken as far as I know.

The APPA is claiming that there are no other forms of high-speed (wide-bandwidth) internet access that could be made available to rural areas, and therefore existing users of the spectrum they propose to use will have to put up with the expected interference. This is troubling because the premise of being the only wide-bandwidth method for rural customers is not true in as much as there is existing technology being used currently that is an adoption of a many decades old technique licensed by the FCC called MDS. MDS is used to distribute multiple full-bandwidth analog NTSC television signals over a wide area. Adaptation of this technology has taken place for high-speed internet. In fact there are such two-way wide-area internet services extant now, and licensed by the FCC, being used in rural areas. These can and probably should be encouraged to be further developed into an even more robust and capable service. The APPA is therefore placing a straw-man, which is clearly specious, and since it is the singular premise of their argument for BPL, the APPA arguments should not be considered viable.

Further, even if there was no such existing rural internet service, the FCC has never taken away such a large relative cache of primary users and made them secondary as the APPA proposes when it wants to be immune from resolving interference caused from their implementation of BPL. The proposed spectrum, from 2-80 mhz, represents almost the ENTIRE unassisted long-range frequency spectrum available for emergency communications available to the FCC to license. It is not only of interest to Amateur Radio Operations, but will adversely affect ALL users of that spectrum space, and cannot be replaced by re-allocation to other spectrum because of it's unique propagation qualities.

The FCC has never asked so many users of such an important segment of the frequency spectrum to become displaced in the history of spectrum allocation. There is no substitute for this precious spectrum space, and it should not be so wantonly expended for such a service as BPL, a service that is so easily replaced.

I would finally point out, that the power industry as a whole has precious little experience with this technology and has way too many current problems with their core business to be allowed to venture into placing wide-bandwidth signals on their lines, that currently act as antennas, and radiate that energy wantonly and without any ability to effectively control that radiation. The FCC has many such studies available to it, including the recent ones run by the ARRL of actual BPL testing which caused interference to existing users. These are actual field measurements and FULLY support that there WILL be HARMFUL interference to existing users.

Sincerely submitted;

Bob Finch

