

Dear FCC Commissioners,

The transmission of data over power lines cannot interfere with existing radio services in any band. As Vice President of one of the largest RF/Microwave filter manufacturing concerns in the world for infrastructure and broadcast applications, I experience the mistakes made by the FCC in a very direct manner. The report made by the ARRL should be considered very seriously. The resulting increase in the noise floor energy will immediately and detrimentally affect all radio services in the proposed spectrum in a way that is uniquely unmanageable.

I believe that the power line proposal is roughly equivalent to broadcasting, and that the use of wires adds only increases the efficiency of the system to a small degree. The proponents of this idea should be viewed as making an application for the spectrum they will operate in; they are intentional radiators under the FCC's definitions.

I also believe that the spectrum must be managed in a manner similar to water rights; first in time - first in right. To do otherwise is a disincentive to investment in radio equipment development and services that might be rendered obsolete. And the use of power-line data transmissions will destroy the usefulness of much of the 1.5-30 MHz bandspace that Amateurs utilize. Indeed, what is prized about many of these bands is the low noise floor, which together with "E" and "F" layer propagation make long distance communications possible.

The Amateur Radio Service should be considered a think-tank. While manufacturing activity continues to be shuttled overseas by short-sighted corporations, IDEAS start to be the mainstay of our economy. Many of the engineers working in the wireless field are Amateur Radio Operators, and 100% of them have benefited from the radio "playground" that the Amateur Radio Service provides. It is an educational institution that must be protected. It is also the source of much of the technology being discussed.

Finally, I disagree that this new "medium" will make the data transmission market more competitive. The current state of affairs (cable vs DSL) has proven that defacto price fixing will ensure that a new medium does not offer a unique pricing structure; rather, it will offer new corporate entities the ability to participate, which does not actually benefit the consumer. While I am a believer in the free market, I don't consider what will result to be a step in that direction.

Jeff Sloane  
VP Operations  
Integrated Microwave Corporation  
San Diego, California  
858-259-2600