

There is a significant risk to high frequency ("HF") communication affecting the Amateur Radio Service ("ARS") in implementation of Broadband over Powerline ("BPL"). Specifically, both good science and experience in Japan indicate significant increases in noise across 160 meter through 10 meter amateur bands, which already suffer noise generated from many sources, man-made and natural.

As the Commission is aware, HF bands are vital to the maintenance of emergency regional and international communication. The ARS portions of the HF bands also serve as a back up system of emergency communication for our nation when others fail.

To jeopardize HF with known, broadband noise pollution can cripple the ability of the ARS to utilize these frequencies, and to serve the nation.

On this basis, I urge the Commission to reject implementation of BPL contained in these proceedings.