

19 August 2003

Federal Communications Commission

Reference ET Docket 03-104

I am writing in response to the proposed plan to provide Broadband services over the United States of America power grid (BPL).

From articles I have been reading it seems that this is basically a done deal, dictated by the good old USA philosophy of the "Almighty Dollar" controlling what happens in this country.

The potential problems of this system have been well documented and I have attached an article that demonstrates the problems this BPL system will generate. The test was conducted in a fairly limited frequency range, however it was over several Amateur Radio bands in the HF region. As such it would make any communication in the HF spectrum of approximately 1 to 60MHz almost impossible. If the FCC were to look at the user groups in this HF spectrum many they would find many necessary and critical needs in addition to the Amateur Radio frequencies.

What would happen to the users that would receive interference due to the BPL being implemented?

I am not a Johnny-come-Lately to the Amateur Radio hobby, having gotten on the air in 1958. I have watched as the quality of persons enjoying this hobby has declined, I wonder if this is an intentional ploy by the FCC to eliminate the Amateur Radio service in support of BIG business?

I for one have invested a good sum of monies into the amateur radio hobby

If the BPL plan becomes a reality and is implemented in my area and even the slightest of interference from BPL traffic, I will help to initiate a class action suite against the FCC, its sponsors, and the commercial interests that are expected to be big time profit makers of the system. This action could be expected at the local, state and federal levels and be against all supporters.

I would hope that the FCC will follow the lead of numerous European countries that have rejected such a plan as the BPL because of the interference it causes to HF communications.

An example of an FCC error is the placement of cable TV frequencies that overlies Amateur Radio frequencies in the 2 Meter band (144-148 MHz). It can be demonstrated how transmission on an authorized Amateur Radio frequency can cause interference to channels on the cable network.

Respectfully.

(signature)

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## ATTACHMENT 1

Observed first hand - if you're not worried - you should be.

I had the opportunity to observe BPL first hand this week. It's scary. I was using my mobile ICOM706 - I didn't have my K2 with me, but I believe if I lived in this test area under actual loads I'd be off the air on HF with my K2 and antennas. (it apparently only has few Utility Co. employees in the test area using it)

Here are my observations:

73, Steve N1NB

Observations in the Briarcliff Manor N.Y. BPL Test Area 13 August 2003

One of the test areas for BPL is in Briarcliff Manor, N.Y.. As best we understand it the test area is quite small consisting of about a 1 mile stretch of Pleasantville Road and 3 side street segments extending 0.5-0.7 miles off of Pleasantville Road.

I made a series of tests between 9:30 and 11:30 AM EDT today - 13 August 2003. I was using my mobile HF rig, a Icom 706MkIIIG transceiver and a High Sierra HS-1800DX antenna.

First I drove along the main section and 2 of the three side segments (I was unaware of the third side segment at the time) listening on 20M (14.040 MHz). Throughout the test area and extending a least a short distance beyond very noticeable bursts of noise we heard. I then drove over the main segment again listening on 15M (21.350 MHz) and heard a very loud continuous noise signal.

I then stopped at three locations and made more detailed observations. At the first location near the center of the main segment I listened to 12 frequencies on 20M (14.003-14.350 MHz) and heard bursts of noise the measured S7 to S9 on my S meter. Similarly I listened on another 12 frequencies on 10M (28.056 - 28.983 MHz) and heard similar signals that were even stronger, S8 to S9+20dB! It should be noted that you could hear these bursts across the entire band not just at the frequencies where I stopped to capture the S Meter readings! I understand that these bursts represent burst of activity on the BPL network and I presume the frequency of their occurrence would increase significantly if in a larger more heavily used environment.

I listened to 9 frequencies on 15M (21.085 - 21.438 MHz) and it was much worse a steady S9 to S9+20dB signal. This noise was clearly heard across the entire Band. 15M is unusable in this environment.

At this point I was beginning to think is this my radio?? So I drove about 5 miles away and listened across all three bands. Silence, no noise/interference heard across all 3 bands!

I then returned and stopped at three other locations in the test area. The observations at each of these were essentially identical to the first measurements on 20M and 15M. On 10M two locations were also the same but at third is also had a steady S8-S9 signal.

These steady signals on 15M and 10m (at one locations) sounded like solid noise with some slight clicking/wavering but not anything that would cause the S Meter to deviate from the intolerably loud constant interference level.

At one location on 20M I tuned into two phone and one CW QSOs. I could copy them 100% between bursts, but the interference bursts totally wiped out each of them - even the CW one.

As soon as I departed the area all bands were observed to be quiet and free of interference.

As this setup in neither my most sensitive receiver nor the most efficient antenna, I can only imagine what this would sound like at my home if BPL was active in my immediate neighborhood using my standard,

more sensitive equipment. It would appear that HF would be unusable.