

1) PURPOSE: The Reply Comments in this filing are in response to Florida Power Light Company (FPL) Comments of 7/2/03 and to the other Comments and Reply Comments on record that support this ill-conceived proposal.

2) BACKGROUND: Broadband Over Powerlines (BPL) is not technically compatible with existing services and, if widely implemented, would be detrimental to the public interest, because:

a) INTERFERENCE: BPL will cause harmful, disruptive interference to equipment, controls, instrumentation and communications in the high frequency (HF) spectrum as observed and measured in areas of the United States (US) and Europe where it has been implemented.

b) INTERFERENCE: Communications regulators in Japan have rejected a similar proposal because studies there showed the adverse impact it would have on users of the HF spectrum.

c) POOR RESPONSE: FPL and other public utilities have demonstrated a very poor record in satisfactorily responding to and resolving complaints of interference in the HF spectrum that are caused by their equipment. This is confirmed, time and time again, in Commission records.

d) POOR RELIABILITY AND MAINTENANCE: FPL and many other public utilities have demonstrated a very poor record of reliability and maintenance of their equipment as evidenced in the events of August 14, 2003 (great northeast power outage).

e) INTERNATIONAL IMPLICATIONS: HF communications in countries outside the US will be adversely effected due to the naturally-occurring propagation of the interference products created by BPL systems in the US.

f) COMPETITION: Alternate broadband media are widely available.

g) DEVELOPMENT: Additional broadband techniques are in development.

h) VULNERABILITY: BPL systems will be vulnerable to interference from external sources.

i) PUBLIC SAFETY: Emergency communications support that is committed by Amateur Radio operators and organizations to the US Department of Homeland Security, the American Red Cross, and many other local and regional governmental and relief agencies will not be possible.

3) CONCLUSION: The Commission should:

a) Dismiss this proposal,

b) Rigorously enforce existing Part 15 rules,

b) Strengthen Part 15 rules, rather than proposing a system that will exacerbate Part 15 "problems", and

c) Individually and collectively, immediately stop "cheerleading" BPL and allow it to die of its own natural causes.

4) PERSONAL EXPERIENCE AND QUALIFICATIONS:

a) Over thirty years in the computer industry, with a specialization in data transmission.

b) Over fifty years as an active Amateur Radio Operator; currently Amateur Extra class W4AA.

c) Six years as a radio operator in the US Navy.

Sincerely,  
/S/  
Arthur F. Wildblood