

FPL writes "BPL vendors have demonstrated sincere efforts to ensure that their technology, provisioned as an unintentional radiator, does not interfere with FCC-regulated radio bands and will indeed meet FCC Part 15 requirements."

The American radio Relay League (ARRL) has conducted field testing in the test areas for BPL and has found and documented severe interference to the Amateur Radio spectrum. While the goal of providing internet service to remote customers is a worthy project, it must be accomplished without providing unwanted interference to the existing spectrum users.

Florida Power & Light (FPL), in its comments regarding Broadband Over Power Line (BPL) wrote:

"FPL believes that BPL does not pose significant risks for unintended high frequency radiations that will interfere with consumer devices, amateur radio operators, or other forms of commercial communications (television, radio, mobile radio, etc.)"

This is clearly untrue. According to tests that were conducted by the American Radio Relay League (ARRL), BPL IS disrupting RF communications over a broad segment of the spectrum which includes public safety agencies, businesses, amateur radio operators, TV stations, radio stations and other services.

FPL's position that "places the burden on BPL opponents" to show that BPL causes interference is patently unfair. Clearly, the proponent of this new service should bear the burden of proof to show that it does not and will interfere with the existing services. BPL would be a step backward in technology by forcing a potentially harmful transmission method onto an already fragile backbone that has a long and spotty history of HF interference. As an amateur radio operator of over 40 years, I have found the power companies to already be the most frequent sources of HF interference and one of the most difficult to deal with.

For the power companies to promote this system as harmless is simply Unconscionable. The power grid is already one of the most RF interference sources in our spectrum. It is also one of the most susceptible to failure during times of emergency which could result in unparalleled masking of essential emergency HF communications at the very time of its most urgent need. Conversely, it would be subject to interference by the existing spectrum users since there are a plethora of users, many at significant power levels. The power grid is ubiquitous and would serve as a giant antenna.

FPL writes, "FPL owns a 69,000 mile interconnected power line network made-up of large

and small power lines ... in all or part of thirty-five Florida counties." This is a huge radiating antenna into virtually every nook and cranny of Florida. This huge antenna would be fraught with potential leakage points of Part 15 interference. It would also serve as an extremely large receiving antenna and would be subject to receiving interference of the many existing spectrum users, many of whom employ high power levels. The FCC has historically cited power companies for failing to address local interference issues using their current equipment. Who will ultimately be responsible for dealing with the interference issues that will result if the FCC allows BPL to go forward?

There are simply too many points of potential RF leakage in this system to make it a viable system that can co-exist without threat of interference to the other users of the HF spectrum.

Is it not better to utilize the next generation of transmission means by using fiber optic and wireless networking than to risk the potential pollution of our HF spectrum?

This proposal seems to be just an bold attempt by the power companies to grab a piece of the telecommunications pie. It must be noted that they have never been a significant participant in the telecommunications network and should stay in the arena where they are best suited; simply providing power distribution to the consumer.

Please don't endanger our HF spectrum with this proposal.

John E. Hamlet,
Amateur Radio W4ZW, Extra Class