

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the matter of)
)
Inquiry Regarding Carrier Current Systems) **ET Docket No. 03-104**
including Broadband over Power Line Systems)
)
)

REPLY COMMENTS

These reply comments are submitted on behalf of the National Association of Shortwave Broadcasters (“NASB”), which represents eighteen FCC-licensed, privately owned shortwave broadcast stations located in the United States.¹

NASB wishes by way of these comments to underscore its support and agreement with the comments submitted by the American Radio Relay League (ARRL). NASB expresses its strong support of the ARRL filing, and their extensive research into the potential drawbacks to BPL. NASB concurs with their findings that BPL will produce harmful and disruptive interference to the HF bands between 2 and 30 MHz, and that this technology would be catastrophic to the current users of this spectrum.

Further, NASB comments that Homeplug, a manufacturer of BPL devices, has demonstrated that by the use of “notches,” it was successful in minimizing interference in some of the Amateur bands. NASB believes that the methodology employed is highly suspect in its attempt to achieve some compatible “sharing” of the radio spectrum between 2 and 30 MHz. This creation of “notches” in the spectrum would forever constrain the FCC and the ITU from future changes or adjustments in the HF spectrum to accommodate future conditions or needs.

¹ KSDA; WMLK; WEWN; WYFR; KFBS; WTJC; WBOH; WSHB; WHRI; KWHR; WHRA; WRMI; KTWR; KAIJ; KVOH; WJIE; KNLS; and, WINB.

As was demonstrated at WRC-03, several agenda items dealt with increasing spectrum space for broadcasting and amateurs alike, as well as re-alignment and shifting of band allocations. These allocations will be further addressed at WRC-07. Should a BPL “notching” system be implemented now, it may well be in direct conflict with the proper use of the spectrum as dictated by the ITU at a future WRC. The cost of modifying or replacing the BPL “notches” would likely be excessive and prohibitive, thus putting the BPL system in direct conflict with the rightful user of the spectrum. Thus, NASB believes the “notching methodology” is impractical, and should be avoided.

Accordingly, NASB again reaffirms its opposition to implementation of BPL which, NASB believes, would jeopardize the current use of the radio bands between 2 and 30 MHz.

Respectfully submitted,

NATIONAL ASSOCIATION OF SHORTWAVE BROADCASTERS