

I have reviewed a number of the many comments submitted in this proceeding. Unfortunately, most seem to mindlessly support or oppose BPL unconditionally. The technology has great potential -- for both good and for harm. I won't repeat the strong cases made by others for and against it. The trick is to implement it wisely, with due consideration and great care. For example, above-ground unshielded wiring provides an enormous antenna aperture with a high probability of severe interference to the HF spectrum.

Impacted users include national security assets like over-the-horizon radar; civilian infrastructure including not only communications but also research (e.g. wind profiling radars); and a myriad of devices already using HF under Part 15.

Serious consideration needs to be given to limiting BPL to underground or shielded wiring where the threat of emission and propagation of the signals is sharply reduced. It seems to me that it is possible to take advantage of this technology in suitable situations without giving it a blank check to degrade the entire HF spectrum for other users.