

In reply to the named docket 03-104 (BPL) I concur with the comments of ARRL Inc., the national association for Amateur Radio; those of the IEEE, Television Broadcasters, Shortwave Broadcasters, and similar presently licensed users of the HF spectrum from 1 to 80 MHz.

In the comments and replies of the proponents of BPL, no evidence of comprehensive RF interference test results of BPL RFI to other licensed services has been performed or presented.

It would not be good engineering practice to authorize an increase in Part 15 device powers without extensive RFI testing to insure such devices do not interfere with any licensed radio service. It is not sufficient in today's market to try to enforce cessation of use by consumer/ owners after the interference blocks licensed radio spectrum users reception or transmission.

The approval of BPL would not encourage other radio spectrum users to use minimum power for transmission, because the minimum power required would be raised to maximum allowable limits, due to overwhelming interference from Test BPL sites already observed by not only ARRL but independent engineers of RFI Inc., in travels across the USA.

BPL has not been shown to be compatible with existing users of the HF spectrum, and would be a threat to the public, since it would block emergency radio communications by FEMA, emergency radio networks, the American Red Cross, Salvation Army, and other emergency radio networks. These networks support weather emergency communications on behalf of NOAA, and the Homeland Security Dept. emergency communications in any type of disaster or attack upon conventional communications.

The use of widely spaced power transmission conductors for an RF transmission medium is flawed as the conductors are not suited to shielded transmission of RF data. Radiation resulting in interference to other licensed users and listeners of the HF spectrum would result.

The need for RF bypasses around transformers would further aggravate the questionable reliability of the Power System. The recent multi state blackout shows the transmission paths are unreliable and in a questionable state for the transmission of AC power let alone piggy backed RF data of BPL.

For the above stated reasons and other engineering considerations of adequate service of Broadband data by non interfering means, BPL over Power Lines should NOT be developed. It would only cause more problems for present interference receiving, licensed users, of the HF spectrum. The ambient RF noise level can be shown to have become higher over the last several years, and BPL should not be added to that increase in spectrum noise pollution.