

Comments on the FCC proposal to allow power companies to provide BPL (Broadband over Power Lines).

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Dear Commissioners,

I strongly advise you to reject the proposal to allow broadband internet access over our nations power lines. There are multiple reasons for this both technical and from a market perspective.

From the technical side of things, the interference potential to amateur, commercial, military and governmental communication services is tremendous. As an active amateur radio operator, I have on numerous occasions had to deal with power line noise radiated by my local utility's power lines due to bad insulators, junctions, etc. In once case, the offending piece of equipment was over 1/2 mile away. In other cases, it took me months to solve the problem with the power company.

If I have these problems with the utility carrying just power on their lines, what will happen when they start carrying data which uses carrier waves in the HF frequencies? The blackout of 2003 which happened nearly a week ago has shown us that this nation's power line grid is not what it should be. Adding BPL to this potentially defective grid is a recipe for disaster.

If communications are interrupted or interfered with the damage could be irreparable. In times of severe weather ham radio may be the only communication medium available to a local area. In the summer, there are regular nets that meet during hurricanes and these nets are invaluable in helping aid in the disaster. If such nets are compromised by BPL, the results to the safety of the citizens of the USA could be disastrous.

Additionally, in this time of the War on Terror, it is essential that our military and commercial radio services be allowed to operate unimpeded. BPL could interfere with that as well.

The second issue of a market perspective is that the demand for such a broadband service just does not exist. The internet crash of 2000 and the subsequent depression in telecom spending is proof of this. If demand for broadband and internet access was so high as to need this new and potentially invasive technology, then all the ISPs and network provider companies that went bankrupt in 2000 would still be in business. Even today nearly 3 years after the crash, many ISPs are still struggling to survive. Adding another source to the glut of internet access out there won't help anyone. The market has shown that the average person just does not want to pay the extra cost of having a broadband connection. And as for areas that cannot get DSL or cable, there is always the option of technologies such as internet via satellite, MMDS, LMDS or even T1. It would behoove the FCC to change the tariff structure of T1 lines which is a mature and proven technology. T1

access could be provided cheaply and w/o interference to nearly every home in America. BPL just is not needed.

The power companies have little incentive with the current regulation structures to upgrade and improve their transmission capacity. Trying to talk to someone technical about interference from their power transmissions is next to impossible. Should we really trust them to carry data and possibly interfere with or block critical HF and VHF communications?

I urge you to decide against the use of BPL. The Japanese MPT voted in the last year to not allow BPL based on the potential for interference. The FCC would be wise to do the same.

Regards,

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