To Whom It May Concern:

Let me get right to the point:

I am not an engineer, but I have been a licensed and active Amateur Radio operator for over thirty years. I have seen many new communication methods come into place, going back long before the pre-World Wide Web Internet. In my years, I have had to deal with and amicably solve many interference problems both for my own station and for others. For this reason, I with held earlier comments on BPL until I had time to review sufficient material to make an honest and reasoned opinion.

However, after spending much time reviewing as much as practical comments filed on this docket, and after investigating and listening to sample audio recordings based on HF reception in areas currently undergoing Broadband Over Power Line (BPL) testing, I fail to understand how BPL can be implemented with having a disastrous effect on virtually all radio services (including amateur, commercial, broadcasting and military) that currently make use of the HF spectrum in one form or another.

Proponents of BPL have failed to actually demonstrate if or how it is possible for BPL to operate without causing massive amounts of electro-magnetic interference to established communications services. I see no evidence of any comprehensive testing of any potential RF interference or how to avoid it. In fact, it appears that virtually all BPL testing is taking place in areas that lack significant numbers of HF users that could or would complain about EMI or RFI.

In short, testing appears positive because they're "cooking the books." Accountants cutting corners in this way are going to jail; surely those who are supposed to be doing thorough and comprehensive testing should be held to just as high a standard.

If BPL is implemented as described, and EMI or RFI avoidance measures are not undertaken, it may prove near impossible to turn it off. It behooves the Commission and all involved to delay implementation of BPL until it can be shown that any potential EMI /RFI can be mitigated or alleviated without causing ruin to existing HF users.

In a Report & Order released by the FCC on May 14th, the FCC declined to allocate frequencies in the 136 kHz band to the Amateur Service because of the potential of interference by Amateurs to the Power Line Communications used in that band by electrical utilities to control the power grid (and in view of last week's problems with the power grid in the North East, and with the instability that the grid now is known to have, that appears to be justified).

The R&O stated that a new amateur Low Frequency allocation was not justified "'when balanced against the greater public interest of an interference-free power grid…we will not jeopardize the reliability of electrical service to the public.''

The root cause of this is the simple fact that electrical lines are unshielded, and thus are de-facto antenna radiators. That's simple high school level physics. So, the unanswered question remains: If the electrical grid can not handle the potential for being overloaded by a handful of amateurs, how can BPL transmitted to the transformer pole outside every residential building in the country NOT radiate EMI / RFI to amateurs and other users?

If BPL adherents can not answer that simple question, or choose to avoid answering it because the answer is not favorable to them, then the system is not now ready for wide spread use – and may never be.

Finally, I find myself in total agreement with comments filed by the American Radio Relay League, the IEEE, many broadcasters, and many other users of the short wave spectrum that BPL as currently proposed will be incompatible with existing users, and will have a detrimental effect on all users, severely impacting emergency and other amateur, commercial, and military users.

In conclusion, I urge the Commission to NOT approve implementation of BPL at this time as it is still an experimental work in progress that requires further testing. Rushing it to the marketplace before it is ready will be a disaster that existing communication services may never recover from.

Thank you for your time and attention.

Ronald J. Notarius
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