

August 19, 2003

Dear Members of the Federal Communications Commission:

As an amateur radio operator and a telecommunication engineer, I would like to make some comments about the Broadband over Power Line (BPL) being proposed.

I'm reminded of the Cable TV Cumulative Leakage Index (CLI) testing that the FCC created and strongly enforced to eliminate interference to other communication services. Cable companies were required to spend millions to 'tighten up' their systems. Every connector had to be checked to make sure no radio frequencies leaked from the center conductor through the shielding to the public airwaves where it could cause interference.

Now, many years later, not to be out done by the cable companies and the telephone companies, the power companies now want to compete in the high speed data world.

One MAJOR difference: The power companies do not have either: 1: Shielding or 2: balanced and twisted transmission lines.

Power companies should be encouraged to use their poles and underground pipes to install fiber, twisted pair, coax cables or other suitable technology designed for high-speed data transmission. They should be required to meet the same CLI standards the other companies must meet.

Unfortunately, the track record of Power Companies to clear radio interference caused by dirty and cracked insulators has been poor. The FCC has issued fines to power companies who can't even keep 60 Hz signals off the air. Why would we expect this to improve at higher frequencies?

In the amateur radio world, we call long unshielded wires stung between poles "Antennas". They, by their very design, are used to put signals on the air for transmission to another location wirelessly. The power companies should NOT be permitted to attempt to use long wire antennas as closed transmission paths.

To permit UNSHIELED and UNTWISTED facilities to carry carriers higher than audio frequencies it to permit intentional interference.

I urgently request that the present proposal be denied.

Respectfully yours,

Ray J. Vaughan
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