

The Radio Club of Tacoma, Washington, submits the following reply comments in the matter of NOI 03-104.

COMMENTS BY AMERICAN PUBLIC POWER ASSOCIATION

COMMENT: APPA first comments that interference is not a factor.

Then it says the burden should be imposed on challengers of BPL to demonstrate that interference is a fact-based, empirical proof.

RESPONSE: Interference definitely is a factor. The current testing by the American Radio Relay League proves beyond a doubt that the radiated interference in BPL test areas makes HF reception completely unusable. Japan and many European countries have come to the same conclusion after extensive testing.

COMMENT: Further to the extent that interference is demonstrated, there should be an attempt to accommodate BPL, even if it means that existing communications providers may have to share or transfer bandwidth.

RESPONSE: This is the most arrogant statement in all the comments submitted by proponents of BPL. First is an admission that harmful interference is a distinct possibility, even though in other parts of APPA's comments it claims that there is no interference potential. Then it makes the disdainful statement that all HF users should go somewhere else. There is no other bandwidth other than HF where long distance communications are possible. Radiated interference, proven by current testing, will impact communications by the military, astronomers, emergency and homeland security, short-wave listeners, amateur radio operators, and all other HF users.

COMMENTS BY AMERON ENERGY COMMUNICATIONS

COMMENT: AEC urges the FCC not to rely unduly on test models or speculations of interference.

RESPONSE: Actual testing of BPL in the U.S., Europe, and Japan has proven that interference is a fact, not a speculation.

COMMENT: BPL systems do not pose interference to licensed radio users.

RESPONSE: Same as above response.

COMMENT: Test conclusions show emissions above Part 15 limits were observed between 2 and 30 MHz within 20 meters of the power line. No appreciable emissions were detected beyond 200 meters from the lines.

RESPONSE: Here is an admission that BPL DOES cause interference to HF users. The great majority of U. S. residents live within 20 meters of power lines. Emissions in excess of Part 15 limits violate FCC rules and therefore cannot be allowed. As for the 200-meter statement, all houses in the U.S. have power lines leading to them, therefore nobody is free of the proven interference admitted in AEC's comments.

COMMENTS BY CURRENT TECHNOLOGIES

COMMENT: Comments filed with the FCC have most grossly overstated the interference potential of BPL.

RESPONSE: Actual testing has proven the interference potential is extremely high. See <http://arrl.org/bpl> for audio and visual proof of the actual interference to HF communications in BPL test areas.

COMMENT: BPL emissions are much like other common sources of radio-

frequency noise, such as computers and household appliances.

RESPONSE: Emissions from unintended radiators fall under FCC Part 15 rules. If such emissions cause interference, they are most likely exceeding Part 15 limits. Using these noise sources as a standard for comparison to BPL emissions indicate that CT envisions that BPL will also violate Part 15 emission limits.

COMMENTS BY POWER LINE COMMUNICATIONS ASSOCIATION

COMMENT: The Commission must discount speculative and self-serving comments offered by parties who seek only to hinder the deployment of BPL technology.

RESPONSE: The millions of Americans who use HF for communications are are only concerned with the proven interference from BPL that will cause the HF spectrum to become unusable. The FCC is charged by law to protect licensed radio users from conflicting technologies. The comments from users of HF who are extremely concerned about BPL's proven interference are certainly not "self-serving."

COMMENTS FROM UNITED POWER LINE COUNCIL

COMMENT: BPL promotes homeland security.

RESPONSE: UPLC doesn't explain how BPL promotes homeland security. In fact BPL will greatly decrease homeland security by dramatically raising the noise floor of receiving equipment used by stations involved in emergency and disaster communications, which will make such communications impossible.

COMMENT: The UPLC is pleased to respond to FCC's NOI that there has been no interference reported in any of its field trials.

RESPONSE: If this is the case, then the trials were not realistic. Such testing should have been done in the neighborhoods of short wave listeners, amateur radio operators, and all other users of HF. Actual field-testing done in the vicinity of HF users show an extremely high level of interference.

Respectfully submitted:

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