

On behalf of the 120 members of the Tampa Amateur Radio Club, Inc., first formed in 1922, we wish to express our opposition to the approval and proliferation of broadband over powerline internet technology.

In stating our opposition we adopt the comments of the ARRL in this matter and add to those comments as follows:

1) It is clear from the testing that has been done in the United States, Japan and in Europe that BPL technology has not demonstrated its ability to meet the requirements of Part 15 of the commission's own regulations. BPL must be considered as a Part 15 system and be made to comply with radiation standards. In determining compliance with Part 15, the BPL impact and emission levels must be looked at as the cumulative effect of the radiated emissions, not in any individual point. It is clear from the research done in the field that the levels of interference would render a great deal of the spectrum useless.

2) There is no need for this technology that would justify the wide swath of spectrum that the technology would create interference with at such levels as to render large parts of the spectrum unusable. Suppression technology to accompany BPL technology must be developed to avoid these impacts before deployment.

3) Florida Power and Light (FPL) "FPL believes that arguments voiced by amateur radio forums ... remain unsubstantiated and speculative without direct evidence that BPL vendors' technologies cause interference in excess of approved limitations established by FCC guidelines."

To address that speculation, please refer to extensive testing conducted by the ARRL: <http://www2.arrl.org/news/stories/2003/08/08/2/?nc=1>

The video contained at this location demonstrates not only the actual interference generated by these BPL systems but also the severity and breadth of such interference.

4) There is no demonstrated need for this technology that is worth the slice of the spectrum that would be polluted by this radiation.

5) Amateur radio has an historic position in communication that has value beyond tradition and faces BPL as the most threatening danger to its continued viability.

6) The spectrum suffers from interference from many power line problems that this commission has chosen to involve itself in enforcement capacity even before BPL. There is no possible way the commission can ignore the existing problem as evidence of the broader impact that deployment of this technology would create to the spectrum, especially the amateur radio allocations in the HF and VHF portions.

It is for these reasons and the evidence represented herein that the Tampa Amateur Radio Club urges the rejection of the proliferation of the BPL technology until it can be deployed in such a manner where interference will be eliminated.