

Dear Sirs,

I must object in the strongest possible way to the way in which some of the commissioners are endorsing BPL (Broadband over Power Line) technology without any concern for the devastating effects this would have on the invaluable 2 to 80 MHz segment of the radio spectrum.

The latest evidence of this lack of concern for the FCC's responsibilities to the users of this spectrum is illustrated by the remarks made on September 25th by Commissioner Kathleen Q. Abernathy to the United Power Line Council (UPLC) under the title "Broadband Nirvana". According to her prepared speech, BPL technology has no downside, and is being impeded only by "old rules" and regulations. Obviously, the power industry would like to see any impediments to their use of this spectrum removed so that they could use it for their profit. The "old rules" permit a vast number of uses for the 2 to 80 MHz spectrum without dominance by any particular party. The problem is that every other user of this spectrum will find it rendered practically useless by BPL. The rule changes the power transmission industry wants amount to wholesale transfer of this spectrum to their exclusive use, without any concern for either existing or future users of these valuable frequencies. Commercial innovation and new services using this segment spectrum would therefore be eliminated.

Of course, the UPLC claims that there would be minimal or no interference to other users of the spectrum occupied by BPL. Obviously, the UPLC has an agenda to support, and would not be expected to offer unbiased technical assessment of the impact of BPL. Independent organizations such as the American Radio Relay League (ARRL) and US government radio users represented by the National Telecommunications and Information Administration (NTIA) have expressed "broad concerns" about interference from BPL. The ARRL has conducted field studies in BPL trial areas that show BPL to be not just noisy, but extremely noisy – so much so that other services, such as aeronautical beacons are rendered useless!

Personally, as an amateur radio operator and an electrical engineer with experience in telecommunication, BPL seems like a bad idea from the beginning. Power lines are an exceptionally poor medium for information transmission. That, coupled with the fact that a wide variety of technically better, "cleaner", inexpensive and competitive technologies exist for delivering broadband internet service, why even consider BPL with its potentially devastating consequences? Only the power transmission industry thinks BPL is a good idea.

I have no objection to any FCC regulatory changes that help profit making enterprises enter new areas of service, so long as it does not unfairly impact others. The one sided support that the commissioners seem to be showing toward BPL flies in the face of the technical analyses and the best interest of all users of the 2 to 80 MHz spectrum. The FCC should retain all part 15 rules regarding interference between services. It is these rules that prevent chaos, allow competition, and promote the greatest commercial and public utilization of these frequencies.

In short, BPL is a very bad idea, and the FCC rules regarding interference between services must not be weakened.

Regards,

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