

October 1, 2003

Dear Commissioners:

I believe it would help clear up some matters to put into perspective some metaphors used by both sides. Commissioner Kathlene Abernathy in her Remarks to the United PowerLine Council Annual Conference, Sept. 22, 2003, stated "I want consumers to have a choice of multiple, facilities-based providers, including not only cable and DSL, but also powerline, wireless, and satellite services. Such a robustly competitive and diversified marketplace is something I would call broadband Nirvana." She further sticks with her Nirvana metaphor to explore "the path to enlightenment."

The metaphor Nirvana leaves something to be desired. "Buddha taught that our life in the physical world is merely illusion. When people let go of their worldly pain and worries, they can unite with the Great World Soul and achieve a state of complete peace called **Nirvana**."¹ If telephone carrier deregulation were "a robustly competitive and diversified marketplace," then Nirvana would be vacationing in ones cabin with no phone service. We need a better metaphor.

The one I would choose to represent the anything-goes-with-minimal-regulation per Abernathy's speech is: "**orgy 2**."² period of uncontrolled indulgence." Telephone deregulation produced an orgy of competition, with many benefits to the consumer, but when people want to "let go of their worldly pain and worries," it's off to the cabin in the woods.

The ARRL in opposing BPL has come up with a metaphor that in accuracy errs in the opposite direction.

In its comments in response to the FCC NOI, the League characterized BPL as "a Pandora's Box of unprecedented proportions" and said the Commission's Part 15 rules "should be modified so as to prevent interference to users of the HF and low VHF spectrum" from the outset.³

What about MF and higher VHF? Yes, BPL would blanket HF and low VHF with heavy interference to whatever services shared their frequencies, but AM radio and TV would not be affected, so I am in favor of choosing a metaphor not as universal as a Pandora's box.

One of our state representatives has the right idea.

July 23, 2003, 10:25 a.m.

Trojan Horse

The case against drug importation.

By Rep. Joseph R. Pitts⁴

¹Student's Friend World History & Geography 1 ©
www.studentsfriend.com

²Thorndike • Barnhart Comprehensive Desk Dictionary
(Garden City: Doubleday & Co., 1958)

³ <http://www.arrl.org/arrlletter/> The ARRL Letter, Vol. 22,
No. 38, September 26, 2003

⁴Rep. Joseph R. Pitts represents the Sixteenth Congressional District of Pennsylvania. He is a member of the House Energy and

In Homer's Iliad, the Trojan Horse was a hollow wooden horse in which several Greek soldiers hid to gain entrance to the city of Troy. The Trojans wheeled the horse into their city thinking it was a gift, not knowing the enemy lurked inside. At night the Greeks exited the horse, opened the city gates for the rest of their army, and conquered Troy.

Today, a Trojan Horse can be anything that poses as something good, but when let in, it does harm.

Here Abernathy and all see the good of BPL while the users of the HF (and low VHF) spectrum see its evils. As Abernathy stated in her speech, "I am very excited about broadband-over-powerline technology. I have seen it in action, and I believe it has a very bright future." But there was a lot of excitement seeing the Trojan horse.

History Essay 81⁵

Troy and the Trojan War

~~ Paul V. Hartman ~~

In the ancient legends of early Greece, a city-state called Ilium, representing a colony of earlier migrating Greeks, existed in the north west corner of modern Turkey. The story of Ilium (Troy) and its siege by the Greeks was told in two epics by the Greek poet Homer (Iliad, Odyssey), and a third (Aeneid) by the Roman poet Virgil.

...

The siege of Troy occupied 10 years, due to the impregnable stone walls of Troy. Then the Greeks hit upon a trick. Odysseus had a wooden horse built, in which he and several others hid. The Greeks then pushed the horse to the gates of Troy, seemingly offering it as a gift to the victors, and then sailed away. Despite the warning from Priam's daughter Cassandra, the curious Trojans pulled the wooden horse within the city walls and celebrated. That night, Odysseus and the others crawled out, opened the gates for the Greeks who had silently returned, and the city was sacked.

To use this metaphor, the fuss raised by the ARRL, many amateurs, and other HF users would be "the warning from Priam's daughter Cassandra" the fine presentation given the FCC by industry ("I have seen it in action") would be the wooden horse in

Commerce Committee and the Energy and Commerce Subcommittee on Health.

⁵-- The Hartman Web Site © , 1996 All rights reserved. --
www.naciente.com/essay81.htm

all its glory, and the hidden danger of radio interference those Greeks in the horse and their comrades hiding at sea. "Trojans pull[ing] the wooden horse within the city walls and celebrat[ing]" would be that orgy of competitive marketplace we were discussing.

This metaphor can throw the light of historical insight onto our current situation. Look at the situation from Abernathy's speech:

...Companies take enormous risks when they invest heavily in communications networks -- such as the broadband networks being built today. ...If the Commission signaled that it was heading down a path toward extension of our legacy rules, that would have a chilling effect on investment. Therefore, raising the specter of heavy-handed regulation--that is, ignoring the central premise of the Nascent Services Doctrine--would threaten to undermine our core goals of fostering facilities-based competition and broadband deployment. ... Finally, it is important to recognize that although the emergence of new platforms like BPL will eliminate the need for many *competition-related* regulations, *other* types of regulation may well remain necessary. For example, the FCC must implement public policy goals unrelated to competition, or even at odds with competition. ... it was also right to adopt strict interference rules."

A lot of money has gone into BPL. A lot of reliable data has come into your comments detailing potentially severe interference to HF users. You have to consider that in light of public policy regarding regulating interference, and the companies know that. For example, PUBLIC LAW 103-408 [S.J. Res. 90]; October 22, 1994, SECTION 1 FINDINGS AND DECLARATIONS OF CONGRESS, "(3) reasonable accommodation should be made for the effective operation of amateur radio from residences, private vehicles and public areas, and that regulation at all levels of government should facilitate and encourage amateur radio operation as a public benefit." The FCC cannot "reasonably accommodate the effective operation of amateur radio from residences, private vehicles and public areas" if the very power lines near our homes, above our cars, and everywhere we go are allowed to carry severe interference. Similarly, other services need to be protected on their frequencies. But the heavy handed regulation needed would have a chilling effect on investment, and the companies know that.

So what do they do? They hide the problem, hide those Greek soldiers. At least that is what history says will happen.

Facts & Figures about the Trojan War⁶

Trojan Horse

The Trojan (Wooden) Horse was a stratagem devised by Odysseus to enter Troy with a small armed force. The plan was to open Troy's gates, so they could bring the main body of the Greek army into the city. Odysseus was the leader of this company. Below was the list of selected Greek warriors who hid inside the Horse's belly.

⁶ www.timelessmyths.com Copyright: Timeless Myths (Classical Myths) © 1999-2003, Jimmy Joe. All Rights Reserved.

Odysseus
Diomedes
Lesser Ajax
Menelaus
Nestor
Idomeneus
Meriones
Teucer
Neoptolemus Polypoetes
Leonteus
Philoctetes
Acamas
Demophon
Euryalus
Sthenelus
Amphilochous
Echion Epeius
Eurypylus
Machaon
Menestheus
Podalirius
Thoas
Anticlus

Note that Odysseus was forced to kill Anticlus inside the Wooden Horse, because Helen tried to trick the Greeks into revealing to the Trojans that there were men hidden in the belly of the Wooden Horse. Had Anticlus called out, all the warriors inside of the horse would have died.

"Odysseus was forced to kill Anticlus." Figures. Now, I have a BSEE, I have been to engineering school, and I remember enough from transmission line theory to know what electrical engineers should know, that unless an unshielded line is balanced and spaced a tiny fraction of a wavelength, it will radiate like a sieve. The engineers at these companies know that, some if not most of them. You think they won't be silenced by management from letting this out? "Odysseus was forced to kill Anticlus." Why do you think that with all the reliable studies and models, and whole countries (Japan) giving up on BPL, the BPL companies will admit to no interference potential? Somebody is being silenced. At least history suggests that.

TROY IN MYTHOLOGY⁷

In *The Iliad* abduction of a woman is shown as the cause of the war. According to this, the beautiful Helen, wife of Menelaus the King of Sparta, is

carried off by Paris, the son of Priam, King of Troy. The infuriated Menelaus begs his brother Agamemnon, who is the King Mycenaea, to punish Paris and Troy and have his wife brought back. King Agamemnon, aided by their kings, comes to Troy with a large Achaean army which he formed. The ships anchor in Besike Bay. It is from this point onwards that the Iliad shows us the way.

The Wooden Horse at Troy

...

The Achaeans have realised that they will not be able to take Troy by war. The Goddess advises them to use a stratagem. Accordingly, the Achaeans build a wooden horse filled with soldiers and present it to the Trojans. Then, they hide themselves behind an island, giving the impression that they are through with fighting.

The Trojans start victory celebrations and having gorged themselves with food and drink, fall profoundly asleep. While they are sleeping, the soldiers in the wooden horse open the city gates wide. The Achaeans, who have returned, enter through the open gate and put the sleeping Trojans to the sword till the morning; very few people survive to escape. The Priest Laocoon has told that the wooden horse was a ruse, but the Gods have caused him to be strangled by sending two serpents. Thus, Troy which resisted the 100.000 strong Achaean army for ten years, fell in one night through the treachery of the wooden horse.

All this celebration over BPL reminds one of: "The Trojans start victory celebrations and having gorged themselves with food and drink, fall profoundly asleep. While they are sleeping, the soldiers in the wooden horse open the city gates wide. The Achaeans, who have returned, enter through the open gate and put the sleeping Trojans to the sword till the morning; very few people survive to escape. The Priest Laocoon has told that the wooden horse was a ruse, but the Gods have caused him to be strangled by sending two serpents. Thus, Troy which resisted the 100.000 strong Achaean army for ten years, fell in one night through the treachery of the wooden horse."

BPL is not a point source of interference, no more than those few Greek soldiers in the horse were Troy's only concern. What do you think those soldiers will do upon exiting their horse? Why, they will kill the sentries and open the gates letting the whole Greek army inside. Exactly. The BPL devices will connect to miles and miles, thousands of miles of antennas blanketing the countryside and shutting down virtually all HF and low VHF services. Take heed to this warning for a change. The severe interference potential of BPL is real just as the Greek ships were real, hiding behind an island. And the priest Laocoon, warning that the horse was a ruse, was not speaking out of panic as history shows.

I hope this investigation of metaphors helps you keep the issues in perspective.

Sincerely,
Earl S. Gosnell III