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Re: Proceeding 03-104

Before the Federal Communications Commission is an issue called "BPL." That is Broadband over Power Lines. It is a proposed internet access scheme that allows cheap and easy internet access by broadband techniques over ordinary power lines. This system is being tested in several areas of the nation now.

BPL would be allowed under Part 15 of the FCC Rules and Regulations. This part governs unlicensed devices that transmit radio signals or may cause harmful interference. On computers, answering machines, televisions, tape recorders, etc., there is a statement that indicates that the device has met the requirements of Part 15 of the FCC rules, and is in compliance. In addition, the statement reminds users that the device must not cause harmful interference to communications, and must accept any such interference without complaint.

BPL, as proposed, and as being tested, will radiate harmful interference to nearly every communications device known, throughout the radio spectrum from about the low end of the standard AM broadcast band, through the low end of the VHF communications range. Though it will do this radiating under Part 15 rules, it will do so at such close proximity, that is, to the power lines in homes and offices, and those lines leading to homes and offices, that no matter how low the power, it has the potential to affect every form of radio device currently in use below the UHF range.

This includes television, AM and FM radio (even in cars, for as someone rides along the road, the power lines nearby may override any radio station you would normally hear!) wireless devices, such as cordless phones, and may even cause interference to things like garage door openers.

While the primary radiation frequency of BPL will only extend up to 80 Megahertz, harmonics may extend to three times that easily, especially at very close ranges, such as found in the home. This could render home reception of AM, FM and shortwave radio stations nearly impossible.

BPL has already been **ROUNDLY REJECTED** in Japan after a thorough technical investigation.

As an amateur radio operator of more than thirty-five years, this concerns me, and hundreds of thousands like me, for our hobby and service stands to be seriously disrupted. We do perform a public service, as mandated by the FCC rules (Part 97, governing Amateur Radio.) That could be critically curtailed. During times of national emergencies, amateur radio is very often the only communications medium which can get through.

Equally damaging, though, could be the effect on High Frequency

communications used by the military, long range aviation, and for maritime use. To some lesser extent, VHF communications by Public Safety (police, fire and ambulance) radio operating just above this region (and in some cases still in the region of 30 to 50 MHz) could also be affected.

BPL has been declared, by Kathleen Abernathy, Commissioner of the FCC, as a "Broadband Nirvana." Ms Abernathy is a politician, not an engineer or technician. She is an attorney. What she sees is the potential for rapid income for the power companies, and easy access by everyone, to the internet. In other words, a massive dollar sign.

What she does not see is that the power companies, such as our own Florida Power And Light, do not have lines that are data quality, and the expense of upgrading these power lines is immense. Very few rural companies can afford it, so it will not be the "Nirvana" Ms. Abernathy predicts. Instead, it will only be useful initially in the best of the power companies, with the latest of equipment, and the cost even then will be astronomical. Thousands of filters will be required on each line, to separate signals, to keep them isolated from each other as well as from line noise, and to make the lines data-worthy.

It concerns me that the FCC has been galloping ahead so rapidly with docket number ET 03-104.

Those of us in the communications business or hobbies (and I have been in both) find BPL to be the worst possible threat to all forms of radio communication, including life-saving systems. Tests being conducted are making radio reception even on a standard car radio on the streets, for blocks around the test area, virtually non-existent. We believe the National Association of Broadcasters and FEMA will also resist BPL, and some others who are doing so include aviation services and the NTIA.

Please help us prevent the BPL proposal from becoming a reality. Please vote against ANY bill that seeks to allow or further promote this malicious and ill-advised proposal.

Thank you for your attention to this.

Sincerely,

Brian Carling