

Dear Commissioners,

I am strongly against BPL. There are going to be significant and major interference issues and unintended consequences, some of which could drive businesses out of work and jobs out of our economy.

Anyone operating in the HF Spectrum or anyone selling equipment to those who use the HF spectrum or anyone who sells a service to those who use the HF spectrum will be negatively affected. This would include AM Broadcast Stations, Amateur Radio Operators, Information and Religious Services, Short Wave Listeners, Military and Transportation services.

I urge the commissioners to listen to the actual BPL sites (not those engineered by the utility industry). BPL drowns out many AM broadcast stations (550 Khz. to 1700 Khz). frequencies. The broadcasters will undoubtedly complain that they are not able to reach their served markets with their advertising and programming. This will make their franchise less valuable and require less employment.

One oft-quoted example in Emmaus, PA, where BPL has been already been placed into service, is an example of a location where many listeners in Emmaus cannot hear KYW AM 1060 KHz. in Philadelphia which is running 50,000 watts power. BPL also renders the HF spectrum useless to Amateur Radio Operators within 100 meters of the exposed BPL lines. This could seriously impede emergency communications. In fact, it probably will since the regional and statewide nets are always in the HF segment.

Currently Cable Services deliver similar services via "Closed Circuit" cables and fiber optics. Leakage of the Cable Services into the HF spectrum are severely dealt with by the FCC. Leakage of BPL into the HF spectrum will not even be a violation since open wire cannot suppress leaking of RF. If BPL is permitted, it should be only on shielded, filtered lines, properly grounded and maintained similar to those required by the cable TV industry. RF signals are not supposed to escape from or intrude into the cable TV lines. Radio signals can coexist with cable signals even on the same frequencies. Havoc occurs when signals leak into and out of the cables. Are the BPL users going to establish replacements for the current amateur radio emergency communications stations?

Currently, we hams frequently contend with noisy electric power lines, hardware, and transformers which interfere with our reception. The FCC requires the electric utilities to repair and clean up those lines. Please do not allow any change by allowing "open wire BPL." During emergencies, how will we communicate?

Even if BPL is turned off during emergencies, what hams will be left to communicate? They will have quit in disgust, sold their equipment, and dismantled their stations. The FCC must protect the commercial and the non-commercial communications interests that invade the HF spectrum.

This is irreversible damage. No amount of Digital Signal Processing can erase this interference. Once the jobs are lost, they are going to be gone. To damage the HF infrastructure of licensed amateur radio operators is to remove the backbone of emergency communications.

There are better ways to accomplish the same goal than to destroy and wreak such damage on so many services for no reason whatsoever.

Sincerely,  
Brian Fernandez  
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