

While it is in the public interest to promote new technology and to encourage innovation and competition, pollution in any form is best prevented than cleaned up afterwards. The pollution I address now is Broadband over Power Lines or BPL.

While I am commenting as a radio amateur, I am also a licensed commercial operator and have held executive positions in the largest telecommunications companies in the country during my 40 year career. BPL is one of the worst ideas to ever come along. Today part 15 is totally misunderstood with regard to interference both in terms of generating and accepting interference. While I am personally terrified of what may become of the HF spectrum, spectrum that is for the entire planet to be protected, I also recognize that my licensed transmitter signals will enter powerlines rendering even nicely encoded digital signals compromised and useless at times. It will be very difficult as it is now to explain that this is a fact of life to those whose computer communications is disrupted.

Therefore, I am against the use of exposed or open line BPL. BPL poses a serious problem for any user of the HF Spectrum. This would include Amateur Radio Operators, Short Wave Listeners, Military and Transportation services. BPL drowns out many AM broadcast stations on the 550 Khz. to 1700 Khz. frequencies. The broadcasters will complain that they are not able to reach the current market with their advertising and programming.

For example, in Emmaus, PA, where BPL has been already been placed into service. Many listeners in Emmaus cannot hear KYW AM 1030 kcs. in Philadelphia, running 50,000 watts power. BPL also renders the HF spectrum useless to Amateur Radio Operators within 100 meters of the exposed BPL lines.

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 if BPL into the HF spectrum will not even be a violation as open wire cannot suppress leaking of RF. If BPL is permitted, it should be only on shielded and filtered lines, 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. Our local electric utilities, PSEG and GPU, are very cooperative, compliant, and helpful. 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 most likely have quit in disgust, sold their equipment, and dismantled their stations. The FCC must protect the non commercial communications interests that invade the HF spectrum. To damage the HF infrastructure of over 1 million licensed amateur radio operators, is to remove the backbone of emergency communications.

There are better ways to accomplish the same goal that the power industry is seeking. Lets build covered bridges around the problem, not clear the village of all the infrastructure.

Very truly yours, Roger A. Shultz