

Reference: Comments on 03-104

I am writing in opposition to the proposed use of broadband over power line (BPL/PLC). My interest is that of a potentially affected party.

I am a short wave listener, an amateur radio operator who has devoted many years to public service activities, a citizen who relies upon public safety services such as police and fire departments and a listener to both the AM and FM domestic radio services. All potentially threatened by BPL/PLC.

Tests in Europe, Asia and North America have demonstrated that BPL/PLC technology causes severe interference to wide areas of the electromagnetic spectrum. The BPL/PLC technology is also susceptible to outside interference. The interference demonstrated in the tests on several continents referred to above not only support the contention of interference mentioned in this paragraph, but have led to the termination of tests due to the negative impact of BPL/PLC as proposed in FCC documents.

It seems some FCC commissioners have bought into the idea that the BPL/PLC proposal is a innovative way to bring digital communication including Internet services to the world. Clearly, such a conclusion is not supported by tests. The only thing it will do is financially pad the pockets of a few companies and greatly harm large amounts of currently used electromagnetic spectrum.

I am very concerned as someone who has been directly involved in radio communication networks during emergencies. I've served both as a communications coordinator for a municipality and as an official with oversight of amateur radio emergency response activities.

The interference demonstrated across the US in current experiments is terrible. I am concerned that you are in effect creating a "taking" of radio spectrum without just compensation and a total disregard for the damage being done to other radio services. BPL/PLC not only interferes with medium and short wave transmissions, it is expected that various signal leakages and mixing will create spurious emissions and interference in both the AM and FM domestic services. Moreover, there is the expectation that it may very well interfere with certain areas of the electromagnetic spectrum utilized by public safety services. I refer you to the opposition of the Association of Public Safety Communication Officers (APCO) for more details. They coordinate police, government and university radio spectrum on behalf of the FCC. APCO is opposed to BPL/PLC.

It is my understanding that you have been charged with protecting a major asset, a unique and important natural resource of the United States of America. If that is one of your missions, then it is totally inappropriate for the custodian of our radio spectrum to permit the great damage that BPL/PLC has been shown to create. The FCC should recommend against BPL/PLC and I urge you to do so.

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