

I am strongly opposed to relaxing current rules to allow broadband over power lines systems to be allowed in the United States.

1) There is abundant evidence that this proposed technology will not just raise the overall noise floor found in the shortwave spectrum - it will generate interference both domestically and internationally, to the point of making much of the amateur radio spectrum unusable in the U.S. Given the electric power industry's spotted history in cleaning up power line interference, I am skeptical of any real cooperation in cleaning up interference issues, particularly if the Commission gives BPL providers free rein to interfere with licensed services such as SW broadcast and amateur radio.

2) I am greatly concerned that civilian aviation communications will be impacted with increased intermod and harmonic interference from these proposed services. The AM infrastructure used in aviation is much more vulnerable to mixer products that will be caused when unintentional radio emissions from broadband combine with emissions from other licensed services.

3) BPL will greatly interfere with domestic reception of foreign shortwave broadcasts, an hobby that is enjoyed by many people today.

4) The type of interference generated from these systems will be heard world wide and will reflect poorly on the U.S. in the international community.

5) It is not clear that introducing intentional radiators of this sort would not be a violation of international treaty in that BPL will likely interfere with SW broadcast reception outside of our ITU region.

6) Interference with amateur radio has the potential of impacting homeland security issues, where amateur radio has a distinguished history of providing support in time of disaster. The level of interference generated by these systems will practically preclude this function in the future. The old saying in the amateur community is "if you can't hear 'em, you can't work 'em" - and it is hard to hear them with 40db over S9 signals interfering with the signal that you are trying to received.

6) To my knowledge, Highway patrols in western states still use HF radio when VHF/UHF circuits are not available. What is the impact on these services?

7) The Commission would be making a bad precedent if it allows a non-licensed service to intentionally interfere with a licensed service.

I suspect that this is a slippery slope for the Commission - it will result in a multitude of other requests for similar consideration, and will result in a regulatory nightmare over time.

I would like to thank the Commission for their consideration of these comments.

Best regards,
David E. Ritchie III
3302 Devaughn Drive
Marietta GA 30066-2349