

As an amateur radio operator since age 7, and a graduate of the MIT department of Electrical Engineering and Computer Science, I write that I am strongly opposed to ET 03-104 and 04-37, which alter Part 15 to allow electric power utility companies to use unbalanced line transmission of HF and VHF on electrical power lines. The existing Part 15 regulations are appropriate for limiting the effect of short-duration, narrowband unlicensed emissions on licensed users. The BPL initiative, with its always-on, broad-bandwidth characteristics, will wreak havoc with HF and possibly VHF communications of radio amateurs, fixed and mobile service, and government users.

I have written my congressional representatives to urge that they investigate the FCC's actions regarding the BPL initiative, as it does not appear to me that the necessary studies have been done, nor does the timeframe allow for it. In addition, I have seen no satisfactory response to the Federal Emergency Management Agency request echoing these concerns, other than a statement from an FCC official to the effect that "Part 15 will deal with it," when this appears to be erroneous.

ARRL Lab Manager Ed Hare, W1RFI, said "The limit for an unintentional emitter on HF is 30 uV/m at 30 meters from the source." I live approximately 10 meters from a neighborhood power line, and noise for me would increase by approximately 24dB under these broadband limits.

I believe that the rush to take spectrum away from me and from other users and give it to unlicensed electrical power company uses is unprecedented, and unwarranted, given the option to use microwave communications, existing or new unlicensed (or licensed) UHF spectrum such as used by 802.11b and 802.11a, and fiber optics such as planned for my town, Palo Alto, California, which will offer 100MBit fiber optic service to every address. (See <http://www.cityofpaloalto.org/cityagenda/publish/uac-meetings/3068.pdf> for the City's report "FTTH FINAL REPORT AGENDA MARCH 17, 2004").

In conclusion, I ask for more time for studies by accredited, neutral parties to be conducted, for other BPL proposals to be evaluated that have no impact on HF and VHF spectrum, and for the commission to re-examine the priority of BPL as a means of providing internet access.