

I am, at this point in time, vehemently opposed to the FCC authorizing BPL in the USA.

BPL NEEDS MORE UNBIASED TESTING AND INVESTIGATION. Typical of any service, once it is enabled, it will prove difficult to shut off without huge gov't subsidies if it proves to be as harmful as have already been demonstrated in Europe and Asia. Austria, Japan, and Spain have already done some trials and then refused to authorize BPL based on the harmful interference.

There seems to be a big rush, spurred on by BPL's proponents. I sincerely hope it is just not a matter of those lobbying Congress who then in turn might pressure the FCC. Other clues: The National Telecommunications and Information Agency (NTIA), part of the US Commerce Dept., undertook an extensive study very recently and is slated to publish their findings very shortly. So.. Why the rush for the BPL NPRM ?

The FCC is seemingly (in my opinion) dragging its feet on following an action taken recently at the International Telecommunication Union's (ITU's (ITU's The US is a signatory to the treaty) World Radio Conference 2003 (WRC03). That change would immediately enable an additional 265,000+ US amateurs to access the Amateur Service's allocated HF bands (frequency below 30MHZ). IS there concern that additional 265,000 new HF users would notice any BPL induced problems ?

So.. Why the rush ?

BPL may, in the future, prove to be of value to American consumers. A network connection as ubiquitous as an AC power plug is very appealing at least on the surface. However, we now already have four (4) venues for broadband access: Cable, DSL, Satellite, and wireless. These already provide for a very competitive environment. Advertised prices for DSL and Cable broadband have been dropping; there actually seems to be a price war of sorts going on. Additionally, many DSL and Cable Broadband providers now offer free/self installation and/or free equipment to new users

BPL/PLC, which is being billed by the United Power Line Council (UPLC), BPL's industry spokesgroup, to better enable rural broadband, would actually have the same economic problems that DSL and Cable suffer from -- low population density. I would suspect that if authorized, the BPL providers would soon be asking for government subsidies in order to enable the service in those same rural areas they are using as a wedge to get started.

BPL / PLC has been tried in a number of other countries (Austria, Japan, and Spain). In all those cases, it did prove harmful to other licensed services. In the case of Austria, it virtually wiped out the Red Cross and other emergency nets operating on HF.

Putting an rf signal on an unbalanced medium designed for only 60Hz will create a lot of interference with other services licensed and otherwise. I doubt the BPL providers have the ability to mitigate the potential problems at this time. It's not only

Amateur Service operators, but users like the FAA, FEMA, NIST, NOAA, DOD and the service branches, licensed &#8216;Short Wave&#8217; broadcasters, etc. that are susceptible to the interference that BPL will create. The trials done in other countries should be looked at by the FCC in detail. The laws of physics are not different in Europe & Asia as compared with North America.

Hundreds of BPL systems (and there will probably be hundreds very quickly if authorized) will undoubtedly raise the noise floor level worldwide. The portion of the proposed spectrum to be utilized by BPL (2 thru 80MHZ) has a significant portion (2 thru 52 MHZ) that is already in use for worldwide communication on relatively modest power. It is not uncommon for HF users to be able to reach Europe and Asia from the US on 10W or less. Same goes for communications to S. America and the Caribbean with low RF output power.

The BPL operators will not be able to predict where other licensed users will pop up. Amateurs can legally operate anywhere, not just at the mailing address on their license. In addition, DoD can also operate over a wide portion of North America.

I would implore the FCC to table this NPRM at the moment and more fully study the past trials in Asia & Europe, as well as the NTIA&#8217;s soon to be published interference studies.

For all the above reasons, I am vehemently opposed to the FCC authorizing BPL in the USA at this time. If the potential problems can be proven to be mitigated, then I might reconsider my opinion.

Respectfully submitted: 19 March 2004