

I am opposed to BPL implementation as it will seriously degrade all forms of wireless VLF/HF communications. Emergency communications in these bands will be significantly degraded. Vital emergency services such as the hurricane HF net and VLF/HF based search and rescue may disappear. Other services at extreme risk are: lightning detection networks, "atomic" clocks, low-power AM stations (many emergency stations), and RFIDs operating in the HF band. RFID technology promises to be a vital factor in increasing productivity and consumer convenience. Use of RFIDs operating in the HF band (now at about 31.65 Mhz) may be precluded by BPL. Low power AM stations are becoming vital elements of emergency communications especially for evacuation purposes. The CWO, Citizens Weather Organization, is developing a wide-spread net of local area lightning detection systems that will surely be rendered useless by BPL implementation. Professional lightning detection services may disappear entirely.

Clocks synced to WWVH/WWV transmissions are a major source of accurate timing for many purposes. BPL will degrade performance.

I have been a research electronic engineer for five decades, and a significant amount of my experience has been in the area of electromagnetic compatibility. I believe that BPL will probably be a major source of electromagnetic interference to many services via both direct propagation and conducted interference on the power line per se. The extent of this interference must be defined early-on by careful, well-structured investigations. The rush to "field" BPL is not wise. BPL-induced failures may occur that can not be foreseen without controlled testing. I respectfully suggest that the FCC establish a more deliberate and critical posture regarding BPL implementation.

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