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April 27, 2004

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Subject: ET Docket No. 04-37

Dear FCC Official:

As Wisconsin ARRL/ARES Section Emergency Coordinator, and RACES Chief Radio Officer, I am disturbed by the potential for interference to HF communications should broadband over power line (BPL) be widely implemented. I have read the information published by your agency, as well as other analysis, and believe HF communications will be negatively impacted by BPL technology.

As you may know, communications on HF are significantly influenced by atmospheric conditions and without interference from BPL systems, communications can sometimes be difficult because of weak signals and noise. I fear additional noise on the HF bands may render them useless for emergency Amateur Radio communications. Thus far, I have not been satisfied with the solutions I have heard to solve those problems.

I also understand the intense desire to provide high-speed access to the Internet for more remote areas not covered by DSL or cable service. I am sure utility companies stand to profit from this technology, and large numbers of the population will enhance their lives by having easy, fast access to the Internet. All decisions have trade-offs.

Please consider those of us who volunteer thousands of hours each year helping our communities in time of need through the resources we call Amateur Radio. We can provide communications when no one else can. In order to be efficient at doing so, we need to have respectable numbers of trained, professional operators. If noise becomes such an issue in the Amateur HF spectrum, unfortunately, ARES/RACES members will not use them. This equates to reduced training and efficiency of our volunteers to respond to national, state and local emergencies and disasters. I don't want to see that happen, and I don't think the FCC does either.

I have questions about how licensed radio services are going to be protected from harmful interference from BPL? There is already a lack of enforcement for inappropriate language and activities, not only on the Amateur Radio bands, but also in other broadcast and communication modes. Additionally, with these emissions streaming over unshielded power lines, how will ionospheric propagation be addressed? There are many questions, which have not been answered. We can say, they will take care of themselves, but they will not. If the Amateur Radio HF bands become unusable, that will be a great waste of a free, valuable national resource.

Before endorsing the widespread implementation of BPL, I hope you consider all of the factors. Amateur Radio is one piece, while FEMA, Emergency Management, the Military and Aviation, and other organizations are also stakeholders. BPL would help rural customers and the economy, but at what cost?

Thank you for your consideration.

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