

Ladies and Gentlemen of the Commission:

I have been waiting to read the NTIA report regarding the matter of having BPL operating in the HF spectrum, from 1.7 to 80 MHz. I am sure you will agree with me that they did an excellent job of analyzing the technology involved, and the caveats of deploying such technology. After seeing for myself the in depth and technically excellent report they produced, I think it's safe to say that their credibility on this matter is above reproach.

Since the NTIA has weighed in on the matter of BPL in the HF spectrum, let's examine one of their comments very closely. "Moderate to severe interference is likely to result to aeronautical services below 6km altitude, within 12km of a BPL source."

Now that sounds pretty benign, until you consider that commercial aircraft will only experience severe interference during approach, landing, take-off, and climb-out. Any pilot will tell you that these are the most hazardous periods of a flight. An examination of NTSB crash data reports will confirm this for any of you who doubt it. Why do we want to permit our electric utilities to engage in Electronic Countermeasures against our own commercial aircraft?

Non-commercial flights, and many commuter flights frequently operate entirely below 6km altitude (18,000 ft). So they will always be subject to the interference that NTIA describes. Private aircraft usually operate entirely below 18,000 feet. Will we lobby next to abolish general aviation so little Johnny can play online games using BPL supplied internet service? Where are our priorities?

Can't you just see it now, "I couldn't hear the outer marker as I was on final approach." Does someone have to die before we realize that having BPL operating in the 1.7-80 MHz frequency range is a bad idea? As a matter of policy this is a bad idea, and from a technical standpoint this is a bad idea.

Power lines were never intended, nor designed to handle HF radio signals. In their current decrepit condition, they are barely able to deliver electric power reliably. Remember the huge blackout last August? The same entities who should be maintaining our power grid (but clearly aren't) are the same entities who want carte blanche to interfere with the entire HF spectrum. Does the commission actually believe that a leopard can change its spots overnight? Does the commission really believe that these same entities are going to be responsible, law abiding, yet unlicensed (and unaccountable) users of the HF spectrum?

Recent comments from some of the BPL providers leaves me worried as well. Comments to the effect of, "We will decide what is and is not harmful interference...and whether or not we will correct it..." coming from some of the power companies currently offering BPL services are downright scary. Will the Commission have the will, or the ability to do the right thing, and enforce the existing rules not IF, but WHEN (as the NTIA asserts) harmful interference from BPL occurs. It sounds to me like we are about to let the fox keep watch over the chicken coop. It also sounds like the fox is already licking his chops.

Broadband Internet for everybody, as the President desires, is a noble and worthwhile goal, and should certainly be pursued. The Commission is to be commended for investigating how to do just that. However, permitting BPL in the HF spectrum clearly should not be the method we use to achieve it. When fully deployed, it will present a safety-of-life issue for airline passengers, flight crews, and people who live near airports. It is abundantly clear that we need a different method to achieve that goal.

Respectfully submitted,
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