

Broadband over power lines, as proposed, has the potential to cause severe problems to a wide variety of spectrum users domestically and internationally, both to those licensed by the Commission and many not.

While my life-long passion for using the 3-30 MHz spectrum in the Amateur Radio service would likely be devastated if the current plan is allowed to continue, a far greater set of problems will likely occur in rural areas of the United States where lives will likely be lost over time.

In those sparsely-populated regions, local law enforcement, fire department and emergency medical services rely on radio communications in the 30-50 MHz region, a part of the spectrum included in the current BPL plan. Furthermore, since roads are fewer in these areas, the likelihood is that power lines carrying this "service" will run beside the only roads on which emergency vehicles travel. Their ability to clearly receive calls from their dispatchers will be severely compromised by the noise generated by these broadband signals. It is therefore likely that calls will be missed entirely, with devastating consequences.

Aircraft traveling over oceans use the 3-30 MHz spectrum to communicate with ground-based services, as do ships at sea. While there are obviously no power lines in the immediate vicinity of these aircraft or vessels, the very nature of the those frequencies is that weak signals can travel over thousands of miles or around the world completely. Therefore, relatively-weak BPL signals will propagate globally in times of high solar activity. As an example, my station, operating with a mere 1 Watt of power into a simple wire antenna about 30 feet in length, has communicated with stations in Hawaii, New Zealand and Australia on frequencies in the 14 and 21 MHz ranges. Now imagine BPL signals with "antennas" (i.e. the power lines themselves) miles and miles in length, radiating a signal far more powerful than 1 Watt. Would any members of the Commission want to be aboard an aircraft at 35,000 over the north atlantic, who can't hear the urgent call of an air route traffic control center telling them of an imminent collision?

Aircraft also utilize certain frequencies near 75 MHz for a marker beacon used in low-visibility approaches. As a pilot, I would not like to be making an approach at IFR minimums only to not be able to clearly receive this beacon to guide me through the fog.

Model airplanes are remotely controlled in the 72 and 75 MHz ranges, at the top end of the BPL spectrum. If a model flying at 500 feet were to suddenly lose communication with its control box because the BPL signal was stronger, imagine the outcry that would result when that plane crashes into someone's yard, perhaps killing a person on the ground.

Finally, of course, there is the Military and other governmental users of this spectrum, such as FEMA. None of their High Frequency (HF) communications would be safe under this plan.

There are certain other BPL technologies that are in the investigative stage at this point which will not pollute this

finite resource, and I urge the Commission to rule in such a way that only BPL solutions using these methods be considered.

Available and affordable broadband Internet service is absolutely a necessity, and I applaud the government for recognizing such. However, to destroy communications for thousands of Commission licensees and many more thousands of unlicensed receivers of foreign shortwave broadcasts is foolhardy at best, and dangerous at worst.

Finally, what is colloquially known as "Part 15" regulations must NOT be modified to allow any exemption for BPL, should this dangerous technology in fact be allowed to continue. It is imperative that no licensed service receive interference from BPL transmissions. Given the global nature of the HF radio spectrum, however, this is a nigh-impossible task from a technological standpoint.

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