The HF radio spectrum is a unique resource. It is the only part of the radio spectrum where worldwide communications are routinely possible without the need of additional infrastructure; all you need is two radios, one at each end. This ability to span the globe makes it the preferred home of many services: amateur radio, allowing individuals to communicate directly; shortwave broadcasting, bringing unfiltered news from other countries directly to the people; as well as government and military use.

BPL threatens to eliminate the usefulness of the HF radio spectrum. The interference caused by the systems currently in use is not minor. It would seriously curtail shortwave listening; in particular, the voices of smaller countries, which typically have modest facilities, would disappear from the radios of American listeners. It would make international communications by radio amateurs, who use much lower power levels than broadcasters, nearly impossible.

The proposed remedies to BPL interference would not solve the problem. Notching out specific frequencies, for example, won't work, because so much of the HF spectrum contains services that should be protected. (If you protect the amateur radio and shortwave broadcast bands, and all the frequencies used by the US government and military, you don't have much left.) Adaptive BPL systems that avoid frequencies that appear to be in use by local transmitters fail to protect one-way services such as shortwave broadcasting, or amateur radio operations where operators often listen for weak signals before transmitting.

The Part 15 limits are not adequate to assure that BPL would not cause harmful interference, even if it were possible to make sure that all BPL radiation were within those limits. Part 15 was designed for point sources of interference, not sources that blanket nearly all populated areas. Interference from a point source can be mitigated by moving to a different room of a house; interference from BPL may be impossible to avoid by any means short of moving to a desert.

I believe that the HF spectrum is too valuable to waste on BPL. There is no other radio spectrum that can achieve its worldwide reach. We have other ways to provide broadband Internet service that do not destroy this irreplaceable resource. I do not believe that any action other than an outright ban of BPL technology will adequately protect HF radio.