

I wish to state that I support the American Radio Relay League's position on this proposal, and would like to make a few additional comments.

First, the 2 through 80 Mhz spectrum proposed to be used by the vast majority BPL providers has characteristics for providing long distance communications that are unique and not found in any other part of the radio frequency spectrum, that being the ability to communicate long-distances without the aid of either terrestrial nor space relay devices. This can be accomplished using moderate or even low transmitter power levels, given that the ambient receive noise level is kept low. For the various licensed radio services that rely on these unique characteristics, few if any cost-effective alternatives are available. However, wireless Internet access such as that found under the 802.11b and 802.11g standards are already being used in the UHF/Microwave spectrum for providing broadband access to numerous users.

Second, BPL does not appear to be needing the unique long-distance propagation characteristics found in the 2 through 80 Mhz spectrum. The choice seems to be guided more by initial outlay costs, and by the unlicensed radio frequency emissions permitted by FCC part 15 devices. However, as it was written, FCC part 15 did not envision anything like BPL being used under its rules. The fact that part 15 does not protect users from licensed services communications means that BPL is subject to a greater level of interruption or degradation of service to the end user than that afforded by cable or fiber optic connections.

Third, the 78 Mhz bandwidth found in the 2 to 80 Mhz spectrum would place an upward limit to how much bandwidth that could be provided to the BPL end user. In contrast, the UHF/Microwave spectrum of 300 Mhz to 3,000 Mhz is 2700 Mhz in bandwidth. That is more than 34 times the amount of bandwidth. In addition, it is easier to focus the direction of coverage and pattern of coverage of a UHF/Microwave signal than it is with 2 Mhz signals because of the physical size of antennas involved.

In summarizing, let me state that as a licensed amateur radio operator, N0KM, I would like to see the 2 through 80 Mhz shortwave spectrum preserved as the natural resource that it is. As an Internet user living in a rural area, I would like to see a reliable broad band service provider available that can provide predictable, reliable Internet service that is not subject to Interference to my amateur radio operations, nor from my operations, nor from the operations of other licensed services. I believe that this can be accomplished by use of fiber optic cable as much as possible, and by use of UHF/Microwave spectrum only where necessary. Please avoid the use of the 2 through 80 Mhz radio spectrum!

Thank you,

David Newmyer

N0KM