

The proposal to expand the emission limits allowed for Broadband over power lines should not be allowed. The disruption to all over the air services based on the limited testing that has already occurred is dangerous. Public safety can depend on the ability of relatively weak signals to be detected and the information to be passed on to the appropriate services. The testing in at least one case has left the upper end of the 20 m amateur band relatively useless in the vicinity of the test site. The power company even claimed that there was no longer "harmful interference" when in fact the opposite is true.

The record of the power industry is dismal in dealing with electrical noise that affects over the air services. There is no reason to expect that compliance with any standard that the commission may determine will be any better. I expect that the level of noise any new standard may generate is far higher than any test site has demonstrated. Power lines, from an engineering point of view, are simply not designed to be Radio Frequency transmission lines.

If the commission's goal is to expand broadband service to rural areas, or expand the choices available in urban areas, this is one of the most expensive and ineffective methods possible. Fiber optic satellite and other over the air services (such as in the 2.4 GHz band) are superior methods from a technological as well as cost standpoint. They provide far more bandwidth without the disruption of important over the air services.

I note that some members of the commission has assured the public that over air services will be protected from harmful interference. If the commission adopts this proposal then several safeguards must be built in to the ruling. At the very minimum the determination of what is "harmful interference" must not be determined by the BPL provider. It should be determined by the licensed user(s) of the spectrum. If there is an interference problem, the BPL provider should be required to resolve the issue within a few hours. There have been many instances where months have gone by before a power company has addressed an interference problem here in the midwest.

In summary, I believe that the harm done far outweighs any benefit that may be derived from this proposal. Superior technology exists to meet the public need for Broadband services. BPL will eventually be an administrative problem for the commission as it tries to resolve numerous interference complaints associated with this proposal.

Thank you for reviewing my comments.