

To: The Commission

Given that:

- 1 - President Bush has called for a development of technical standards to facilitate the deployment of BPL.
- 2 - The Commission has a responsibility to facilitate the deployment of BPL if possible while ensuring protection from harmful interference to licensed services.
- 3 - BPL radiates RF energy on frequencies of operation in the HF spectrum.
- 4 - Even low levels of received RF energy from BPL devices will cause harmful interference to services that conduct very weak signal communication such as the Amateur Radio Service. Interference complaints have been documented and interference issues have been confirmed by the recently released NTIA study.
- 5 - BPL providers are attempting to define and dictate to the licensed Amateur Radio service a level of interference that the BPL provider does not believe harmful, even though this level of interference precludes weak signal communication, which is by definition harmful interference. BPL providers are incapable of removing this interference or they obviously would have done so during this testing/rulemaking period.
- 6 - BPL providers' best solution for mobile operations have been to suggest that interference is short lived and is therefore not harmful because the mobile station will be passing through the affected area. The obvious omission is that mobile operators who pull off to the side of the road to complete a QSO in an affected area will experience harmful interference. As currently proposed, interference to mobile HF users by BPL equipment cannot realistically be eliminated.

BPL cannot be deployed under part 15 because of the harmful interference it causes to licensed users. Instead, BPL should be recognized as an unintentional radiator of significant magnitude to require specific spectrum allocation for BPL service. The Commission should review all available frequencies and allocate a specific band or bands for the BPL service.

It has been suggested that there is significant available bandwidth in unused broadcast TV channels. Since BPL devices are frequency agile, it should be an easy task to notch TV channels serving local markets while taking advantage of the remaining large and unused spectrum.

The HF spectrum is an extremely valuable resource that will be unacceptably diminished by BPL deployment as currently proposed. If BPL were the only means of Internet access, perhaps arguments could be made that would justify the loss.

This however is not the case. In fact, in addition to the current cable and DSL options, other faster Internet access alternatives

are on the horizon that will be far superior to BPL and do not cause harmful interference. These other alternatives also hold the promise of providing Internet access to rural users.

I understand the Commission does not wish to pick winners. By this proposal the Commission would merely be setting technical standards by which BPL could be deployed. The marketplace will be the determinant of BPL's success or failure. Most importantly, the Commission will have upheld the duty to fully protect licensed users.

Thank you for your consideration in this matter.

Sincerely,

Douglas L. Dowds, W6HB