Re: Proceeding 04-37

I have been involved in the Communications Industry as an Electrical Engineer since 1965. During the majority of that time I have worked on the technical challenges of improving Telecommunications within the United States. I would like to express my opposition to the FCC's proposal to relax it's rules to allow data over power lines known as BPL (Broadband over Power Lines).

BPL on the surface is a good sounding technology since it will bring Broadband access to millions who do not currently have the access, because power lines are everywhere. The FCC must be careful to not over simplify the technical challenges involved in doing this. It is true that the power lines are everywhere and do not need to be installed. Of course the same can be said for telephone lines. Unlike telephone lines the power lines do not have any shielding which is a serious problem. A data signal sent over the power lines becomes, in effect, a radio station broadcasting into a wire that will act like an antenna. Just as an antenna will radiate so will the power lines, and those radiated signals will be received by anyone with a High Frequency radio receiver, not as usable information but as interfering static. Unlike a radio station broadcast, which is a one-way signal, the BPL signals are two-way to allow for the users input data. A non-BPL radio station such as an Emergency Communications station broadcasting in the HF spectrum will be received by the BPL power lines (antenna) and cause interference to the Users data. In the Telecommunications Industry we take great care to insure reliable communication and to limit interference.

The other ways to deliver broadband that do not interfere with the radio spectrum include fiber-to-the-home, cable, DSL, and wireless broadband. These systems use well-engineered industry standards and provide the user with a reliable Broadband connection. BPL on the other hand has had a miserable record in it's filed trial tests and requires extensive rework before it is deployed.

Thank you for your time and consideration. Again, I urge the FCC to not relax the regulations to allow greater radiation of BPL signals.

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