

Ref: Docket 04-37

I am a concerned radio amateur and citizen and would like to submit the following comments regarding Broadband over Power Line technology.

First, since deployment of the technology is, in effect, a "done deal", much must now be done to mitigate and minimize its unintended effects on other services, such as HF radio. Far more than just the amateur service will be affected. Many localities still use lower frequencies in the 30-60 MHz. range for fire, Red Cross, and other emergency communications. Foreign and domestic shortwave broadcasters may no longer have a market in the U.S., since their customers may not be able to hear them over the noise. Of course, the amateur service will be greatly affected. In the rush to deploy this technology, it seems to me that concerns for these services have been ignored.

Also, as a homeowner, I will not want this service to enter my home. I strongly suggest that provisions be made to completely filter any BPL signals from an individual's home if the homeowner so desires. Such filtering must occur at the pole, not the entry point of the electrical service to the home. BPL signals within the home may have unforeseen interference consequences for the average homeowner and the BPL provider must be able to mitigate that if the homeowner or residents so desire.

If BPL causes interference to equipment that is used or operated by a homeowner or resident, it must be possible for the resident to identify the source of the interference. Therefore, I would suggest that some type of identification be imposed on the BPL signal that can be decoded by equipment designed for the purpose. It is one thing to accuse a BPL provider of causing interference, and quite another to prove it. The FCC owes the public this courtesy with the proper rulemaking. Not to do this will be inviting chaos.

I am also concerned and puzzled by the fact that the FCC and potential providers do not seem to be concerned with the effect on BPL services by local HF radio transmitters. There are thousands of sources of HF radio-frequency emissions that are in close proximity to power lines. Research done by the American Radio Relay League and others has proven that even low power emissions can disrupt BPL service. Will all of these services be shut down for the sake of the new BPL technology? The legal implications are staggering. Should BPL services be implemented in my town, it would be imperative that the BPL provider make clear to his potential customers the possibility of interruption of service that may be caused to their new broadband service by local military, emergency services, amateur and CB transmitters. Such notification should be a requirement when the rules are promulgated.

Finally, while am wholly in favor of delivering broadband signals to as many people as inexpensively as possible, I cannot see the benefits to this technology to the average person. Other means of delivering broadband, without complications, are available and

more attractive. These services are likely to supersede BPL within a few years after implementation. Electric utilities will invest millions implementing the service, only to see its popularity and use decline quickly. The utility ratepayer is then left to pay for a technology that is not only not needed, but ill advised. The effort to provide broadband technology to the masses should have taken a course other than the BPL route.

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