

Access Broadband Over Power Lines (BPL) is a technology with great potential to interfere with existing licensed radio services. In an era when homeland defense is a particularly acute issue, the FCC needs to be particularly careful in introducing new, unproven, technologies which may affect essential communications in a disaster. History well documents the contributions of the amateur radio service in such events as the Oklahoma City bombing or the World Trade Center attacks, when normal communications were overwhelmed and inadequate to the needs. Proponents of BPL, with a strong pecuniary interest, have a large blind eye for the potential interference as in paragraphs 20 and 22 of the present proceeding. Comments about whether the power lines are an "efficient radiator" are irrelevant and intended to obfuscate the issue. The comments in paragraph 26 that the offending frequencies may be "notched" are interesting, but part of what makes an amateur radio station an effective tool in an emergency is the ability to use a large number of frequencies. It would be impractical for the amateur operator to contact the power company each time he changes frequency.

Not wishing to stifle technological development, the FCC seeks comments on measurement guidelines. I believe these should most accurately reflect the purpose of measurement, namely, to prevent interference with licensed radio services. Under part 15, it is the obligation of the power companies to ensure that there is no interference to radio services. Measurement must be whenever and wherever interference may occur. It is my understanding that interference near ground level may be very much less than at 30-50 feet where, I imagine, most amateur antennas are found. Testing should be done by independent observers but paid for by BPL operators.

The FCC also requests, in paragraph 43, comment on database maintenance. Since the BPL proponents have a pecuniary interest and a clearly demonstrated blind side, database maintenance should be managed independently and made readily accessible to the public.

It is imperative that the FCC enforce vigorously and immediately any complaints of interference. The power companies have not had the best record of compliance with FCC rules regarding interference with radio services.

I would suggest that if BPL is to be introduced, let it be introduced in a very rural area (which is one of the reasons cited for its introduction) where it will have the least effect on licensed services and where it can be thoroughly investigated by an independent panel for its true potential for radiation of unintended signals. This is also probably the area where it would be least lucrative for the power companies and would allow a realistic evaluation of the economic feasibility of such systems.

Thank you for your attention.

George Noble, KK7FM
Des Moines, IA