

As an FCC licensed Amateur Radio Operator, I am deeply concerned about the risk of BPL interference both to and from licensed High Frequency radio operations. The HF spectrum is unique, in that it can provide world wide communications without the infrastructure of satellites or phone lines. This portion of the spectrum is a natural resource that must be protected from interference that would prove harmful. As has been proven time and again, it is a valuable emergency communications medium. (Federal and Amateur operators have provided those emergency HF communications.)

The technical evidence available today suggests that BPL can create noise levels high enough to make HF communication virtually useless. The proposal includes language that reinforces the notion that BPL providers be required to mitigate all interference, and to provide technology to accept interference from licensed services. I believe the reality however will be quite different, unless safeguards are strong and have high levels of immediate public visibility.

The profit potential from deploying Broadband service over an existing infrastructure is huge. Those interests will most certainly attempt to sway the public in favor of ignoring or diminishing the FCC requirements for part 15 devices.

I urge the Commission to include safeguards that are strong (have specific and serious consequences for noncompliance) and have high levels of immediate public visibility. There must be a publicly accessible database of complaints and their resolution.

Further, I'd ask the Commission to consider the possibilities of providing the BPL service using another portion of the spectrum.