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Budd Lake, NJ 07828

The Federal Communications Commission
Washington, DC

The NTIA BPL Phase 1 Study clearly demonstrated the potential for severe interference by BPL operators to RF users of 1.7-80MHz and possibly higher in frequency. Both NEC type calculations and a field trial series prove this. Of most concern are the highly used bands for public service:

1) Public Service 30-50MHz used by agencies at all levels of the Government, from Municipal to Federal level. These frequencies are in heavy use by non-government agencies such as businesses and other entities.

2) The Federal/State agencies using frequencies from 1.7 through 30 MHz. Aviation use of these bands is constant.

3) Amateur use of the bands located from 1.8-54 MHz. Public service and emergency/training will be curtailed by the severe BPL interference that the NTIA pointed out in their report.

The NTIA Report cited proven interference from BPL both from field measurements and backed by estimations:

"With low-to-moderate desired signal levels, interference is likely at these receivers within areas extending to 75 meters, 100 meters and 460 meters from the power lines."

The nature of this interference was such that for a land vehicle which normally employs a vertical whip antenna, being driven on a road adjacent to the power lines, the interference becomes highly vertically-polarized in nature and this clearly would render mobile use of these frequencies useless.

The NTIA report goes on to show how in other countries BPL was evaluated with the end result either being rejection of BPL as disruptive access method or BPL was permitted only with emission limits much less permissive compared to those of FCC Part 15. This effectively states then that FCC Part 15 itself is much too permissive, and less permissive standards should be adopted and enforced to prevent this type of blanket interference. Of equal concern is whether or not utilities can maintain this type of emission control in actual deployment. Based on actual experience in dealing with Radio Frequency noise generated by electric power utilities, the undersigned believes the companies would not achieve any better emission performance than they do now. Deployment of BPL, and "tuning a system" certainly will require effort and resources that they are most reluctant to provide.

Considering the extensive deployment and system tuning a proper BPL deployment clearly would require, one has to examine the alternatives, especially from the power utilities perspective. The particular technology being deployed is less important than the return on investment. Should the cost of deployment with system tuning/notching be excessive, the alternative distribution methods look far better. Especially when weighing this cost verses the only average bandwidth one obtains verses methods including, but not limited to, microwave BPL (such as Corridor Systems) , fiber distribution and other microwave systems, one has to question the wisdom of deploying HF BPL.

In conclusion, the author believes there are far better solutions to achieving the goal of Nationwide Broadband Access, than the HF BPL method being pursued.

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