

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of
Carrier Current Systems, including Broadband over)
Power Line Systems)
Amendment of Part 15 regarding new requirements) ET Docket No. 04-37
and measurement guidelines for Access Broadband)
over Power Line Systems)

COMMENTS OF BOB JOSUWEIT, WA3PZO

I am concerned over the interference issues raised by current Broadband Over Power Line Communications to HF operations, in particularly to amateur radio communications, but also to the entire HF radio spectrum. As a reporter covering amateur radio public service and emergency communications, I see reports every day of amateur radio operators providing a service to their community, state, nation, or the world. Many reports of the activity involve the use of amateur frequencies within the HF spectrum.

The value of the amateur radio service has been clearly demonstrated over it's history. However this docket seems to indicate that BPL can be established based on local frequency usage. One of amateur radio's key benefits is it's capability to be mobile in terms of operating location. Amateur radio is always there when other communication services fail.

On September 11, 2001 the value of amateur radio was demonstrated as hundreds of amateur radio operators came to Ground Zero in New York and the fields of Western Pennsylvania to provide valuable communications assistance. The number of licensed amateur radio operators at Ground Zero or that Western Pennsylvania field are few. However the work preformed by those amateurs would not have been possible if BPL signals were heard in those areas.

Earlier this month the Weymouth (MA) News reported on Amateur Radio and the Boston Marathon. There are few amateurs living on the course of the Marathon, but the newspaper reported in it's April 28th edition "**Among the key volunteers were 175 amateur radio operators, crucial to event communications, as cell phones are rendered virtually useless due to the high concentration of people and resulting usage.**" Traditional modern day cell phones rendered useless. Backup communications was provided by amateur radio because of it's ability to change frequency.

In addition this weekend a 13 year old amateur radio operator in Tennessee was the only person able to put out a call for help in a remote park as a classmate went under water at the base of water fall. A licensed ham radio operator for almost a year now, he kept the radio with him in his backpack on the two and a half mile hike to the falls. He even had it wrapped in a plastic bag inside his backpack, in case it rained. Again the cell phones were out of range and didn't work. The operator took his radio to the top of the hill. While help arrived to late to save his friend,

amateur radio was the only radio service to make contact for help. Had BPL been causing interference some 2.5 miles off of the main road, help might have never come.

(<http://www.wbir.com/News/news.asp?ID=18003>)

Finally in November 2000 the National Communications System, *TECHNOLOGY AND PROGRAMS DIVISION* VOLUME 7, NUMBER 6, wrote about "E-mail Over High Frequency Radio: Filling the Communications Gap During Unexpected Telephone Outages." The author Steven L. Karty writes " A natural or manmade disaster can quickly over-load local-area communications systems, causing widespread interruption of essential telephone and Internet services. A fire at a telephone company's central office or cellular radio site could shut down its emergency generator, and its battery backup system could be depleted within hours. During the May 2000 wildfire in Los Alamos, New Mexico, area telephone systems were overwhelmed immediately. The three cellular networks and U S West's telephone system all failed: Users encountered constant busy signals, trunk busy signals, incoming calls being turned away, uncompleted outgoing calls, and no dial-tone. At times like these, **high frequency (HF) radio can provide a communications path to the Internet for sending and receiving electronic mail (E-mail) messages.**"

The article points out the use of HF email by the United Nations High Commissioner for Refugees and the International Red Cross. In addition the article points to the NCS's SHARES Communication (HF) network which is staffed by many amateur radio operators. According to the article NCS host's monthly meetings which attract a large number of potential HF E-mail user agencies

Is the Commission willing to allow a potentially harmful product such as Broadband Over Power Line to exist when that product can cause a significant threat to the health, life, and safety of the public that so many other groups and agencies provide on a daily basis? Not only are there potential interference problems in the immediate area of the BPL deployment, but the strong potential of causing interference miles away. Clearly there are alternative forms of wireless communication which would not interfere with the international resource called the HF Spectrum.

I respectfully ask the Commission to reject the proposed Broadband Over Power Line technology. Let the power companies concentrate on providing Power Over Power Lines. Let the users of the HF spectrum continue to provide the services they provide without interference from an industry that has proven, at least in the northeastern United States, that it can't keep the power on during times of non-emergencies.

Respectfully submitted,

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