

The FCC is going in the wrong direction with this proposal. I won't go into the technical aspects of implementation, which are quite obvious to even the least technically inclined but wish to comment on the eventual outcome of this proposal.

Although on the face of it it sounds like it will work under existing Part 15 rules the fact is there has never been the potential of so many part 15 devices deployed before covering such a wide spectrum. I really think what is going on is the FCC is setting up current users of the HF spectrum to be driven out. When a handful of listeners will be able to bring down a system used by thousands the pressure will be on for the FCC and congress to throw up their hands and tell us the spectrum is no longer protected by part 15.

Amateur radio is like a non-commercial public park. The only requirement is the user must obtain a license so he will not spoil it for other users. Natural resources have long been set aside by Congress and the rest of the world for limited non-commercial uses. This is to provide a place for a limited number of people to use and enjoy and to preserve for future generations.

Unlike other natural resources the RF spectrum can be renewed and cleared by users ceasing transmitting but it becomes difficult if not impossible if there are thousands or millions of users who interfere with a few.

Already the writing is on the wall. Progress Energy Corporation (PEC) has had several complaints lodged against it for improper operation and interference from its BPL operations under FCC part 5 experimental license. PEC claims they have fixed the problem with interference when it is obvious they have not. Has the FCC responded by sending out an engineer to check it out? The FCC does not have enough field engineers to police and control the spectrum properly as it is. Don't believe me? Listen to what has happened to GMRS frequencies in larger populated areas. The public is buying GMRS/FRS radios and not obtaining licenses to use the GMRS frequencies leading to interference with licensed users.

Another problem not addressed by BPL is how they propose to protect Short Wave Listeners (SWL). It may be possible to notch out the frequencies used by Amateur Radio Operators but what about people like me who like to explore the Short Wave spectrum looking for new stations to listen to. Do you think the local BPL provider is going to shut down everything in my neighborhood so I can enjoy my hobby.

The amazing thing about all this is it is not necessary at all. BPL can be deployed at microwave frequencies that have been proven to travel using "skin effect" without significant radiation to interfere with existing users. Another alternative is using part 15 devices without powerlines at 2.4 Ghz and other microwave frequencies.

Our local group and Red Cross use HF to communicate throughout the local county and State where other communications links will not work. This requires using HF in cities where BPL has a great probability on interference.

So please help preserve these frequencies for me and future

generations by not allowing the deployment of BPL at HF frequencies.