

I have worked the last five years in the data technology field as a computer technician for an education service district in the State of Oregon, several years as a radio technician for the Federal Government, and have been licensed as an Extra Class ham radio operator since 1956.

I admit that I have no firsthand experience of Access BPL, but have read extensively of the work done in Europe and as much as I could find on the Internet of the work being done in the United States. The proposals present a broadband format that can be de-monstrated as workable, convenient, and inexpensive. I concur that you can say that the system is workable, but not without consequences.

The "Access BPL" system of injecting low-level rf broadband spectrum signals to be carried by a media designed for an entirely different purpose is not without risks. These risks are a form of environmental- and social- pollution that the EMI "compliance Engineers" have worked hard for many years to contain and keep under control. There is neither the manpower or sufficient present technology to regulate and prevent the degradation of one of our great natural resources if the above policies are carried out, i.e., the pollution of the radio HF and VHF spectrum. The FCC, FEMA, NTIA have all admitted that there will be interference. Numerous foreign sources which have been leading in the deployment of BPL have also documented numerous examples of EMI.

The FCC's proposals in the (NPRM) in ET Docket 04-37, involving "Access BPL" appears to be on the threshold of undoing years of EMI "compliance engineering". On one hand, entities and persons are licensed by the FCC in order to avoid serious EMI, but now it is ok to allow RF signals over a system designed for the transmission of electricity and "not" rf signals. These media are forms of radiating antennas and "mitigating interference" has been the new solution. Such a solution leads us now to the policy of prevention to one of bearable "allowance".

One has to wonder, how do we go about and identify a mix of near- and far- sources of interference from unlicensed devices that will feed the power lines, and a likewise contribution from asymmetrical household wiring found in our residences. These will be complex signal structures that can only add to our present noise floor in the allowed spectrum of use. So far deployment offers no solution for mobiles driving along power lines, no long range studies regarding years of prolonged human exposure to residential RF from the household wiring systems, no guarantee of preventing interference to sensitive instrumentation such as used in hospitals and research, and the list goes on and on.

If we have the answers and the technology to prevent EMI similar to the above, then of course, Access BPL can be added to the list of man's usable technologies. Otherwise, I think it would be most prudent to progress within defined limits to protect all resources as technology allows us so that it benefits all of us and not a select group of our population. Who is to say, which is greatest: audio, video streaming and gaming as offered by the internet or nature's provision of the ionosphere which has led us to develop the radio spectrum. Hopefully, those responsible will decide

wisely.

Respectfully,

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