

Before the
Federal Communications Commission
Washington, DC 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 ON BEHALF OF
BULLOCK & ASSOCIATES
Specialists in Telecommunications

My comments in this document will be brief. First, I would refer the reader to another submission on behalf of the North Mississippi Spectrum Users Group. That document contains most of the technical comments I would make, as well as some suggestions. However, I wanted to comment as an individual with my personal thoughts separate from the Users Group.

I have been in telecommunications most of my adult life. I am a licensed Commercial Radio Operator, though I was licensed when it was known as a "First Class Engineer's License". I have also been an Amateur Radio Operator since 1967, and am currently self-employed as a telecommunications consultant specializing in broadband and telephony.

In all my years in telecommunications I have never seen the Commission actually propose a system with so much potential for damage. Ham Radio Operators were the first and almost lone voice in opposition to Broadband over Power Lines, and have taken a lot of heat in the Press and in comments before the Commission for their opposition. As a Ham, I would obviously in opposition to BPL. However, my comments in this document are not addressed simply as an Amateur (that service has been otherwise well represented), but as a telecommunications professional, a member of our Emergency Management Agency's "first-responders", on behalf of my friends in local law enforcement who today already experience more interference than they should, as an individual who enjoys listening to broadcasts on shortwave, and as an informed citizen concerned about the growing problem of spectrum pollution. One might, however, wonder why there has not been an outcry from these other services. Surely they don't want the interference that will surely occur if BPL is allowed to be widely constructed in its current form. Where are their voices?

Well, the answer is really simple. Amateur Radio, because of it's "fraternal" nature, and its strong national organization, has not only been responsible for most of the technological

developments over the years in the art of wireless telecommunications, but, as a result of its nature, maintains a daily interest in what is occurring across the technological world. Therefore, once BPL was announced, it was immediately apparent to Amateurs that this technology was a “spectrum-killer”. However, no other service has the national organization that Amateur's maintain, and indeed, most of the users of these services are unaware of what BPL is or the potential harm it contains. In these instances, who should speak for these interests? Simply – the Federal Communications Commission.

The Commission has been offered evidence of the tremendous interference that BPL generates, and indeed, BPL has been banned in other nations for that very reason. I realize the Commission is under tremendous pressure to do something to get broadband technology distributed, particularly in rural areas, but BPL in its current form is not the answer.

I live in a (very) rural area. In 1996, I was appointed president of a start-up Internet Service Provider in North Mississippi that later became a Competitive Local Exchange Carrier (CLEC), and I ran that organization for 6 years, so I know the issues involved in deployment of broadband, particularly in rural areas (and not very many areas are as rural as North Mississippi!). Indeed, I am forced at my home to use dial-up (where I get a maximum speed of 26,400 bps) for my Internet Access because deploying broadband to my home is still not cost-effective. BPL would be, if deployed, a boon for me, but I understand the problems associated with it, and would vigorously oppose any local installation. I have problems enough with other Part 15 devices in my home, and power line and CATV interference when operating mobile. Additionally, other local users of other services have complained to me about the same interference, though most of their users don't understand where that interference originates.

At a minimum, the FCC should ban BPL in the HF and low-band VHF spectrum, and find a more suitable location, then make sure that the interference potential is still sufficiently addressed (again, see the above-referenced comment submission).

Broadband, particularly in rural areas is a tough problem. But, to borrow a phrase used in the earlier submission: “For every problem there is an answer that is easy, and obvious, and wrong”. BPL is the wrong answer.

I therefore urge the Commission to reconsider BPL in its current form.

Respectfully Submitted,

Karl W. Bullock
President
Bullock & Associates
Ripley, MS. 38663

Email: karl@bullockassociates.net