

First, let me introduce myself. My name is Patrick Mullet, and hold both an Extra Class Amateur Radio Operator as well as a commercial General Radiotelephone Operator's License with Radar Endorsement. I hold a Bachelor of Science degree in Broadcast Electronics Technology and an Associate of Applied Science degree in Radio and Television Service. I have nearly a quarter century's experience in the Broadcasting Industry.

As such, I have severe misgivings over the proposal to ease the Part 15 Rules for the wide scale implementation of Broadband over Power Lines (BPL).

Such an action will allow a non-licensed activity, BPL, to interfere with a large number of licensed, even vital services. Among these services are Amateur Radio, Public Services such as Fire and Law Enforcement agencies, and government agencies such as the Federal Emergency Management Agency and the Military. Other organizations that depend on these frequencies for communications are the American Red Cross, the Salvation Army and other relief agencies. Amateur Radio Operators themselves provide local and regional communications for events ranging from hurricanes, wild fires, and floods. Not only did Amateur Radio provide communications support for the recovery effort after the Columbia disaster and the World Trade Center attack, but we have been charged with providing supplemental communications under the Department of Homeland Security should conditions warrant it.

Easing the Part 15 rules for BPL implementation threatens all this.

Broadband Over Powerlines, as I'm sure you know, is a scheme for providing highspeed Internet access through existing commercial power transmission lines. I have been an adherent of the Internet since shortly after its inception, and would love to see universal broadband access. For a number of reasons, I cannot support BPL's implementations under the proposed rules for a number of reasons, however.

Power transmission lines are designed for the transmission of AC power. When used for communications, they tend to radiate - strongly. Even when used solely for power transmission, they can be a major source of radio frequency noise due to a variety of causes ranging from cracked and weathered insulators to corroded connections. Getting these problems corrected is often a long, tedious process that can be documented from the maintenance files of the Power Companies themselves. Couple this with the fact that digital transmissions, by their very nature, tend to throw off spurious harmonic frequencies, and we will end up with a huge system of radio noise broadcast across a wide spectrum which can not be "notched out," despite the claims of manufacturers.

I fear that the enforcement of compliance of any version of Part 15 will be difficult, given the current atmosphere of reductions in government services. Even under current conditions, getting Power Companies to respond to and correct noise complaints is an arduous process, sometimes stretching out over a period of years.

Not only will BPL interfere with Amateur Radio and Public Service

radio in violation of Part 15, compliant operation of licensed devices in these services will seriously disrupt BPL's service to consumers. In support of this, I draw your attention to the various Electrical Companies' opposition to the Amateur Radio community's request for an allocation in the 136 MHz band several years ago. This request was rejected in part due to Power Companies' strenuous objections that such operations would interfere with their use of PLC (Power Line Control), a system similar to BPL.

The National Telecommunications and Information Administration (NTIA) issued its long-awaited report (NTIA Report 04-413) on the interference potential of Broadband over Power Lines April 27th, and concludes that only will BPL generate interference beyond the limits of Part 15, but that the methods suggested for measurement of this interference is itself inadequate. The NTIA study also hints that the so-called "skywave" interference, interference at great distances beyond the area of implementation of BPL service, may be intolerable.

Lastly, I must point out that a number of countries such as Japan, Finland and Austria have investigated BPL and abandoned it as unworkable after running up against insurmountable Radio Frequency Interference problems..

The problems inherent with wide spread implementation of BPL may eventually be solved, if enough time and money is thrown at them. It will probably not prove to be either easy or cost effective.

Please, do not change Part 15 to allow a large portion of our valuable radio spectrum to be polluted. Not only will it be detrimental to a service that has served as a hobby but served as a valuable resource and research tool, but could conceivably cost lives by interfering with public safety and security.