

The members of the Big Bend Amateur Radio Club of rural West Texas respectfully request the Federal Communications Commission carefully consider the potential for harmful interference when preparing regulations for Broadband over Power Lines. Our concerns include interference to our lawful operation of Amateur Radio Equipment from the implementation of BPL and interference to implemented BPL by our lawful operation.

Of specific concern to us is the mitigation of interference problems that most assuredly will occur. There must be a method by which interference can be immediately reported and resolved. As the Commission is well aware, Amateur Radio is often the service of choice, if not the only service available, when emergencies occur. BPL caused interference could render the value of Amateur Radio useless in some cases.

Our own experiences in efforts to get electrical service "noise" problems resolved leads us to believe that without very strict rules and severe penalties, electric utility companies and their BPL partners are going to be less than willing to quickly resolve problems relative to the Amateur Service.

We are also quite concerned about the interference by the lawful use of our equipment to BPL. Viewing the issue from a worst-case point of view, we would expect radio amateurs to become the "whipping boy" when interference occurs even though we are operating lawfully. We think it is quite likely the Commission could be inundated with complaints about Amateur operation when the "culprit" is poorly engineered, installed or maintained BPL systems.

The Commission's statement that "...in practice, many amateurs already orient their antennas to minimize the reception of emissions from nearby electric power lines" is an unfortunate misconception of practice. The point of having highly directional antennas is to increase the signal strength of distant stations to a readable level while nulling out signals from other directions. The introduction of interference, regardless of origin, could render those antennas useless.

While we appreciate the attempt to provide better Internet access via BPL, even though in our rural area we already have several choices of broadband access, we are most concerned about the potential interference to licensed services and our inability to have those cases resolved when they do occur.

Thank you.