

There can be no doubt broadband over power line (BPL) technology has great potential to service remote areas with broadband access to the Internet. However, in the strongest terms possible, I submit that the technology remains immature and threatens existing services disproportionately relative to its near-term value.

As recent tests in several regions have demonstrated (see www.arrl.org) BPL interference mitigation techniques are not yet effective. None of the several utilities that have fielded experimental implementations of BPL has been able to successfully mitigate interference to existing licensed services. More, at least one has made clear that it has done all it cares to, and will do no more to correct unacceptably high levels of noise. If this attitude prevails now, during limited fielding, it is not unreasonable to expect even less cooperation should full fielding of BPL be approved.

BPL technology will no doubt continue to improve and may, in time, be compatible with existing services. But it has not yet been shown to be compatible with the other licensed services it threatens.

Should BPL be fielded as proposed, government, amateur, and military access to the HF spectrum, particularly in applications which require low noise floors, will suffer. Uses of HF spectrum are already handicapped by often unpredictable changes in propagation and are highly susceptible to noise and interference. And it is precisely this spectrum that BPL threatens with yet another prevalent noise source. More, HF provides the only spectrum that is useful for regional, mid-, and long-range communications in times of disaster. Should BPL be fielded as proposed, the ability of amateur and federal users of HF spectrum will be unable to provide the vital services now available. It should be noted also that the amateur service provides pro bono disaster communications through its network of approximately 700,000 operators and stations distributed nationwide. These stations provide one of the few if not the only widely distributed communications network available to national, state, and local governments in time of national or local disasters, independent of any installed infrastructure. Many amateur stations are equipped with telephone patches (allowing access to the public telephone network) and emergency power. It would be a great tragedy to compromise this network in the interest of fielding an immature BPL system that may, over time, mature to the point that it may be fielded without that risk.

The Commission is strongly encouraged to defer approving any wide fielding of BPL technology until it can be demonstrated that the system can be deployed without risk to existing HF services.