

Federal Communications Commission
Washington, D.C. 20554

RE: Docket No. 04-37

To The Commission:

I have grave concerns over the promotion of BPL technology. There recently has been a test program of BPL using the Amperion system here in Cedar Rapids, Iowa by Alliant Energy. Contrary to representatives of the utility industry that there has been no reported instances of "significant" interference; I can attest that there is significant interference to HF reception within a 500 to 1,000 feet of the Alliant distribution lines so equipped with the Amperion system.

The contention that local utilities will work to resolve any interference arising from BPL deployment with existing services rings hollow. The utilities companies of the United States of America have an excellent service record for reliability and prompt restoration of service, but most often they seem to fail miserably in the handling of interference complaints of any type. Interference complaints seem to have a very low importance level coupled with, I suspect, a lack of personnel having neither motivation or the technical training to locate and solve such issues. Power distribution lines make very effective radiators of high frequency energy due to their tremendous lengths.

The hypothesis has been that such technology (BPL) will enable the providing of access to Broadband (Internet) service to persons residing and working in remote areas. Why then has the testing being done in metropolitan areas?

I maintain that there are in place proven technologies, both satellite and terrestrial, which can provide Broadband access to rural areas that do not pose serious interference potential with existing communications services in the HF spectrum.

It appears to me that Chairman Powell has taken on the role of "cheerleader" when it comes to the issue of BPL. I believe that the American public would be better served if the Commission were to remain true to its mission of regulating and enforcing existing rules and regulations. This would include establishing meaningful measurement standards and protocols for accurately determining potential interference from proposed new technologies to existing services.

Respectfully,

Allan B. Culbert
328 Norman Drive NE
Cedar Rapids, IA 52402