

In Regards To:
ET Docket No 04-37
Broadband Over Powerline (BPL)

The recent NTIA Report on this subject specifically states that Part 15 regulations do not have to be made less stringent in order for BPL to operate. Therefore, no such action should be even considered by the FCC.

This same report finds technical fault with the FCC's methodologies for determining field strength of Part 15 radiators. The FCC should therefore immediately mitigate and re-codify faults found in its technical measurement methodologies.

BPL, deployed in suburban areas even at today's Part 15 emission levels, has the potential to significantly disrupt HF communications to airliners, according to the NTIA. Such disruption of communications is absolutely impermissible, and if the general public learned of this, that knowledge would spell a quick end to the BPL discussion.

BPL technology is ill suited, economically, to serve rural locations which lack broadband Internet access. The FCC should not, even out of context, infer that BPL is any panacea in the quest to deliver economical broadband access to rural Americans.

In short, BPL is a technology in search of a problem to solve, which in turn creates more problems than it seeks to solve. The FCC, rather than encouraging BPL, should demonstrate leadership and steer people away from this innovative but inappropriate technology.

In recent years, the U.S. telecommunications business climate has suffered from overinvestment in areas where it was not warranted. This industry is still reeling from the aftershocks of the "bubble burst." Between 2000 and 2002, 910,000 high-paying jobs were lost in the U.S. telecom industry, some irretrievably.

The Federal Government, through the FCC, should act to help prevent more bad investment and further loss of high-wage jobs, as an investment in BPL is surely doomed in the competitive residential access marketplace.

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