

I have spent 30 years in the telecommunications industry, and after studying the technical aspects of the various broadband over powerline schemes it is apparent to me that there is no way to satisfactorily mitigate the emission of harmful interference if the BPL carrier passband is in the same passband as an existing RF communications service.

The interference from BPL schemes that employ HF frequencies (3-30 MHz) will be particularly egregious because of the ionospheric propagation effects. This means that current test deployments are undoubtedly degrading communications services thousands of miles away when conditions of propagation are good, but that this degradation is, at present, undocumented. If the FCC opens this Pandora's Box more widely, then by the time the degradation to HF communications is widespread and well-documented, it will be too late to reverse course. The FCC will have abandoned its long and noble history of protecting the "magical" HF bands, and over 70 years of honorable history will have been for naught.