

Dear Sirs,

I am an FCC licensed RF/Microwave engineer currently employed in the telecommunications industry in the USA. I am writing out of a deep concern for the proposal to permit broadband transmissions access to use power transmission lines as antennas. This is a betrayal of the the prime directive of "non-interference" by the FCC to assure spectral regulation by good spectral citizens.

The proposal is a bad idea because of the following 3 reasons:

1) It will violate existing laws that have been developed to prohibit conducted RF emissions. Those services that require protection from conducted emissions at the power levels proposed will be just as adversely impacted as if the same "noise-like" emissions were in fact noise, which is exactly what they will be to the entire world, except for the single consumer who wishes to enjoy some convenience at the expense of good spectrum citizens.

2) The only reason that "noise-like" CDMA signals as used by modern cell phones keep from raising the noise level of the entire country is that they are broadcast from isolated antennas, which limit the reception of such transmissions to "line-of-sight". Allowing the transmission of such "noise-like" signals by power transmission lines will allow such signals to propagate far beyond the range of cell phones, and the noise will add cululatively, raising the "noise floor" for all services. THis violates the basic non-interference policy which the FCC was formed to regulate.

3) The proposal will be impossible to enforce. Any restrictions that the FCC may create in an effort to proscribe uses or technlology to limit interference will be unenforcable. The equipment will be manufactured in countries where the FCC has no enforcement power, and the equipment will be built to an "as-buit" specification, where no RF are metrics are performed, and the incentive to build the cheapest devices will mandate the minimal filtering to allow operation of the device. No FCC enforcement will be staffed to handle complaints. Likewise the effected services will not be able to locate offenders of sources wich may operate out of specification.

Even the FCC will not be able tell the origin of suspect sources of interference. How will any offending signals be located? Spread-spectrum signals will not be visible on a spectrum analyzer except as an higher "noise floor". Before you can authorize any operation using this technology you must be in a position to guarantee that you are able to regulate it.

Adoption of this proposal would be a violation of the trust American citizens have placed on the FCC as an agency to regulate spectral access for the public.

Thank You,
Jason Kovatch