

I am troubled by the eagerness the FCC exhibits for overriding expansion of Broadband Power Line (BPL) privilege and use in light of substantial evidence indicating a clear and present threat to the spectrum that very agency is tasked with safeguarding. If a branch of our armed forces were found to eagerly relinquish a resource they were tasked with safeguarding the matter would be swiftly corrected.

I am also disappointed to see wording that shifts the burden of proof so expeditiously from the power companies court to that of the intended victims. Can the evidence presented against increased BPL privilege appear to be from a constituency so incohesive and docile that big money is certain to prevail? Why isn't the long standing and established interests of all HF users placed above the interests and profit potential of our networked utilities? Should foreign news broadcast such as those from the BBC and the learning of other cultures through music be so easily sacrificed?

Where is the result of research stating that radiated broadband energy could not use instead a wireless distribution such as is now available with cell phone technologies. Wireless digital equipment coexists now in portions of the spectrum that is not disruptive to HF. Further deployment of that technology would not endanger existing HF use nor facilitate establishment of a monopoly on Internet access for regional power companies. If it were not true, we would now be experiencing uproar over cell phone tower emissions.

Is it possible the relatively quick expansion or granting of BPL privileges is motivated by a window of opportunity indexed to an approaching lull in the solar cycle? This lull is the point at which fewer spectrum users would observe arrival of new man made interference (RFI and EMI). An indexed establishment of BPL may be no more a coincidence than when power companies raise rates during a period of least use so that users realize the penalty when it is too late to contest the increase.

Should it become more difficult one day for HF spectrum users to communicate using current default modes of SSB, CW and AM they will no doubt turn their interests and funds towards proven digital modes which are inherently more tolerant to elevated HF noise. Can we not foresee the resultant migration of signals to existing and future digital modes being judged one day as interference to BPL? Many of these stations are after all capable of radiating many times more signal power than that currently declared or anticipated for BPL. Will newer FCC legislation then restrict the migration of these users to such digital modes or restrict the use of currently authorized power levels on those modes? Is it not possible that use and experimentation with allowed digital modes by licensed users could produce digital character strings that coincidentally look like BPL control strings? That unforeseen event would of course be found intolerable to such a powerful lobby. What regulation will then be enacted for that unfortunate occurrence?