

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>CARRIER CURRENT SYSTEMS</b>	)	<b>ET Docket No. 03-104</b>
<b>INCLUDING BROADBAND OVER POWER</b>	)	
<b>LINE SYSTEMS</b>	)	
	)	
<b>AMENDMENT OF PART 15 REGARDING</b>	)	<b>ET Docket No. 04-37</b>
<b>NEW REQUIREMENTS AND</b>	)	
<b>MEASUREMENT GUIDELINES FOR</b>	)	
<b>ACCESS BROADBAND OVER POWER LINE</b>	)	
<b>SYSTEMS</b>	)	

**To: The Commission**

Broadband Powerline Issues

Broadband PowerLine (BPL) as proposed by the UPLC (United Power Line Council) and other BPL industry proponents using MF, HF and VHF radio frequencies for its transmission is inherently disruptive to other users of the above spectrum resource. This is nothing more than a unilateral 'land-grab' by the BPL industry for its own benefit to the exclusion of wireless spectrum users. There are far better choices to accommodate the 'third-rail' broadband option. Wireless technology in the form of WiMax, and other WiFi options plus other cable options such as fiber-to-the-home (FTTH), ADSL as well as microwave BPL such as Corridor Systems are superior to the disruptive 'HF' BPL in all ways including the bottom-line metric of bits per dollar. "HF" BPL is not presently and will not ever be feasible for our Government to regulate and enforce due to the rampant interference it will cause.

*The "HF" BPL industry has not kept a consistent message during its initial years:*

- 1) At first it categorically denied the existence of ANY interference, claiming the all the RF energy was staying in the transmission lines and that none of its signal could possibly be leaking.
- 2) Later, its message changed when "some minor radiation" could be detected, but its of no real concern for the licensed frequency users.

3) When this minor interference turned out in reality to be 30 dB or more above the noise level as well as the users, then equipment manufacturers and BPL operators tried various types of notch filters, in which only minor improvements could be made if any at all. Those efforts that produced any detectable improvement normally required significant investment in time and money.

4) More recently, the "HF" BPL industry wants to portray its product as some form of "greater good" with the burden placed on licensed spectrum users in bearing their radiated emissions. If this "greater good" is in form of access to pornographic websites, faster "pop-ups", increased e-mail spamming and other dubious products, then I believe the Commission would be making a serious mistake in touting "HF" BPL. What BPL effectively replaces is of major benefit to our country, and at virtually no cost to our nation.

Evidently, the products that the "HF" BPL industry have produced are the flip-flopping arguments touting its so-called technology. The licensed users of the HF spectrum who use it for wireless communication are the only ones with the steadfast consistent argument that hold any credibility.

The Energy Industry in America and the UPLC would do well to benefit in both the short and long-term, by moving to more advanced technologies that it can integrate within its own systems that would still provide broadband solutions. The use of microwave or wireless options as well as FTTH is more secure, higher in performance and far less likely to cause any disruption to other services.

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13 October, 2004