

Dear Commissioners,

I would like to register my most strenuous concern over and objection to the proposed use of HF over power lines to carry data, so called power-line communications (PLC). The potential for egregious harm to HF users in FCC-licensed services is very high. It has been demonstrated in use in Japan and other countries to be an impractical technology that causes interference at levels so as to render parts or the whole of the HF spectrum unusable at times to licensed users.

PLC is not an answer to the legitimate bandwidth needs of the Internet and other networks in the US. It would provide little value or benefit to companies seeking to expand their data carrying capacity, nor would it offer the consumer faster or more reliable internet service, or reduce significantly the cost to the average consumer. Further, PLC does nothing to increase safety and security with regard to acts of terrorism. Far from it, relying on the land-lines of the power grid, which is an obvious and easy target, is to actually lower our readiness and security. Wireless and satellite-based technologies are far more appropriate and vastly more robust and defensible than PLC. Amateur operators are an installed base numbering over half a million, available to provide decentralized though organized emergency communications around the clock and at no cost to the taxpayer. The value and capability of such service has been demonstrated literally countless times over the past 7 decades. Please do not exchange a solid, clearly viable and robust emergency communication network for one that is untested and most likely liable to turn out to be highly vulnerable, technically troublesome, and inadequate overall.

As an amateur radio operator (FCC callsign KD7BFX), internet user, and operator of website/server receiving more than a million hits a month, I have an interest both in keeping the level of noise and interference on amateur HF bands down, and in seeing the availability of inexpensive broadband internet data access expand. The proposal to allow PLC in the US does threaten to raise unacceptably the former, while promises of the latter are dubious, at best. In addition to Amateurs, ISM users, Federal, state, county, and municipal users, and international broadcasters, consumers using a myriad of home and office electronic devices, from garage door openers to wireless computer keyboards to baby monitors to burglar/fire alarms face the prospect of interference leading to disruption and erratic service with the potential for consequences far more serious than just the nuisance of unwanted operation.

I urge the Commission, in the strongest possible terms, to deny and reject this or any Petition that proposes the unlicensed use of power lines to carry data at HF at signal levels that could be disruptive to licensed HF users. Please do not allow a poorly conceived plan by a Part 15 unlicensed user to degrade the functionality of HF bands, Amateur and other.