

## **Position Statement:**

These comments are filed in OPPOSITION to those filed by Current Injection, Southern Linc, Amperion, and others wishing to provide BPL service and in SUPPORT of comments by filed by Walter B. Hock, The ARRL, Cortland Richmond, Jay C. Adrick and Charlene Davies.

## **Summary:**

BPL is a temporary, unnecessary step to bring broadband to the masses . Germany and Japan have thrown out BPL as the source of too much interference to incumbent spectrum users. BPL is simply not worth the sacrifice of the High Frequency spectrum and it's unique qualities found no where else in the electromagnetic spectrum. If each power line will be a Class A device above 30mhz (that's 90uv/meter at 10 meters) and power lines are virtually everywhere, it will mean all licensed users systems between 1.8 and 80 Mhz will be rendered useless by this "panacea" for bringing broadband to the masses.

XGLC concedes in their comments there is a definite need to specify frequency bands that should be excluded from BPL use due to interference. Powerwan implies amateur bands should be notched out due to the great interference potential. Electric Broadband concedes that fiber is the only real way to get broadband to the masses "as speeds will significantly increase smart build pushes fiber closer to the user" Why not just do fiber from the beginning?

The comment by Charlene Davies is worthy of note. She lives in a remote area of Oregon and pays \$60 / month for broadband via satellite. I live in Meridian, Idaho and pay \$51.95 for DSL. This proves broadband is ALREADY available ANYWHERE. It should also be noted that 80% of dial up users will NOT switch to broadband according the marketing firm Ipsos-Insight.

## **Replies Against Specific Commenters:**

***Current Injection*** states these signals are point sources. Ed Hare's ride and other's proves otherwise. The interference from the BPL system blanketed the whole area. Current Injection also states that signals outside the receiver's bandwidth don't interfere. Current Injection must not know that receivers are

de sensed by such signals and the desired signal would be covered up and decimated by the BPL signal.

**Southern Linc's** system also uses Wi-Fi for the end user connection, but still uses the spectrum between 2 to 50 Mhz to backhaul to the feeder aggregation point. Southern also adds a 50 mhz frequency cap so their BPL system won't interfere with television stations. That's very interesting, since television stations are authorized many times the maximum power of an amateur station, yet the television audience would suffer interference from the BPL system if the 50 Mhz frequency cap did not exist? What are the other users of the short wave spectrum supposed to do? Southern also states that 250kbs bandwidth is shared with 8 to 10 users? Excuse me, but isn't that less bandwidth than customers currently have with dial up service ?

**Amperion**, in their summary state they use Wi-Fi to connect the end user to the BPL system using Medium Voltage feeders. Further, Amperion states they have had no complaints or instances of interference at any of their sites. Amperion seems to be oblivious to the data gathered by the telecommunication Administrations and others in Japan and Europe caused BPL to be banned because the effluvial nature of interference made the spectrum between 2-80 mhz unusable. Amperion does however; believe in the use of Wi-Fi to connect the end user. Now if Amperion would only use existing fiber or replace the ground wire running along with feeder with OPGW, Amperion would have a good, spectrum friendly system.

Amperion claims speeds of 18 to 24 mb/s per feeder. A few questions for Amperion:

- 1) How many customers are you going to have on this medium voltage feeder?
- 2) How many "repeater extractors" are necessary to provide a customer three miles away with service that can be obtained with a single DSL connection.
- 3) What is the minimum committed information rate for each customer ?

It might be worse than dial up when everyone is on line. Wouldn't it be better all around if these customers were aggregated from directly on to fiber and skip this polluting BPL nonsense?

### **Replies in Agreement with specific Commenters:**

This writer agrees with all comments of record filed in opposition to the BPL. The comments by Walter B. Hock, The ARRL, Cortland Richmond, Jay C. Adrick and Charlene Davis stand out.