

**James Burtle**

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**From:** dgsvetan@rockwellcollins.com  
**Sent:** Thursday, October 07, 2004 2:51 PM  
**To:** Anh Wride; Alan Stillwell; Riley Hollingsworth; James Burtle  
**Cc:** w1rfi@arrl.org  
**Subject:** BPL Notching Effectiveness



pic22190.jpg (33 KB)



pic01842.jpg (31 KB)



Communication Receiver Charact...

All recipients,

I sent the message below to Ms. Wilkerson earlier today. I believe that the experiences with the Alliant Energy BPL trials in Cedar Rapids, IA, provide clear indication that notching of BPL spectrum, as presently done, is not, and will not be, a viable means to mitigate interference to Amateur Radio operators and other users of the HF and low VHF spectrum. Further, keep in mind that these unacceptable interference levels were occurring at distances of about 180 meters from the active BPL node, a far greater distance than will be the case for BPL riding down neighborhood power lines on every residential street and alley, thus likely passing within 10 or 20 meters of Amateur station antennas.

Thank you for your consideration of the information.

Dale Svetanoff

----- Forwarded by Dale G Svetanoff/CedarRapids/RockwellCollins on 10/07/2004 01:26 PM -----

Dale G Svetanoff	To:	Sheryl.Wilkerson@fcc.gov
10/07/2004 11:55	cc:	(bcc: Dale G
Svetanoff/CedarRapids/RockwellCollins)	Subject:	BPL Notching Effectiveness
AM		

Dear Ms Wilkerson:

I am the EMC engineer who performed the RFI investigation at the home of Mr. James Spencer, licensee of the Amateur Radio Call WOSR, here in Cedar Rapids, IA. As you probably know, Alliant Energy conducted a BPL trial here in the Spring of this year. Mr. Spencer's ability to conduct two-way HF communications was adversely affected by the BPL signals, and that was the situation which led to my making test readings at his station location.

Briefly, station WOSR is located about 180 meters from the nearest active BPL node of the trial system. Interference from the trial BPL system lasted the entire time that the system was active, which was from late March through late June, 2004. Alliant Energy, and their equipment vendor, Amperion, did employ both frequency notching and system signal transmission level adjustment during the trial period, with varying degrees of effectiveness, and none of it successful at eliminating harmful levels of interference within the assigned Amateur Radio HF bands.

Here are two examples from the Test Report that I wrote on behalf of the Cedar Rapids BPL Steering Committee, and which was submitted to Alliant Energy and the FCC (as part of reply Comments on Docket 04-37):

This first figure shows the spectrum around the 17m Amateur Band, with the plot spanning

17.0 to 19.0 MHz. The 17m Band is denoted by the BLACK line near bottom center of the plot. The BLUE trace was made with the BPL system ON, and the YELLOW trace was made with the BPL system switched off (with due thanks to Alliant Energy). Note that there is a decrease in the blue trace at the lower frequency end of the 17m Band, and I believe that decrease to be an attempt to notch the band. However, please also note that the notch does not extend across the band and that the deepest part of the notch is actually below the 17m Band, making the notch's value worthless. The YELLOW signals are partly due to skywave signals (the traces were taken in late afternoon, when 17m would support skywave propagation) and partly from power line noise, a long standing problem at WOSR.

(Embedded image moved to file: pic22190.jpg)

The figure below shows the area just below and in the 10m Amateur Band. (The 28.0 to 29.7 MHz band is denoted by a black line on the plot.) Again, BLUE trace is BPL ON, and YELLOW is without BPL. In this plot, most of the yellow signals are skywave signals. Please note the following about this plot:

1. The notching missed again. Although most of the 10m band has reduced BPL signal, the lower 100 kHz of the band is receiving full BPL signal strength.
2. The notching is NOT deep enough. Note that most of the yellow signals are of equal or lower amplitude than the notched BPL signals. It is those areas where communications are NOT possible and THAT is harmful interference!
3. In both this plot, and the one above, I added a MAGENTA trace line to the plot. That trace is at a level which represents 1 microvolt of signal in a 50 ohm system, or -107 dBm. The reason I added that trace is because most communication receivers are able to achieve somewhere around a 10 dB signal-to-noise ratio (or better) at 1 microvolt input. That is a very good number for conducting communications. HOWEVER, IF THERE IS ON-CHANNEL INTERFERENCE AT LEVELS OF 1 MICROVOLT OR MORE, THEN NO COMMUNICATIONS ARE POSSIBLE BECAUSE THE USABLE SIGNAL-TO-NOISE HAS BEEN REDUCED TO NEAR 0 dB.

(Embedded image moved to file: pic01842.jpg)

I submit my point #3, above, as the reason for my saying that notching to the levels presently achieved does not work. The in-notch signals would have to be about 20 to 30 dB LESS than they are in the above examples in order to be effective.

Just so that there is no confusion on anyone's part about the above plots, let me state the following:

- A. All plots were taken at station WOSR using Agilent spectrum analyzers and saved onto floppy disc. Date and time stamps, with serial number of the spectrum analyzer, are available for all files.
- B. All plots were made using the antennas and transmission lines of station WOSR - NOT compliance measurement antennas at 3m or 10m from the power lines. The measurement bandwidth of the spectrum analyzers was set at 3 kHz, NOT the compliance measurement bandwidth. That is because communication receivers use bandwidths of between 2 kHz and 3 kHz for voice SSB signal reception. The object of the testing was to duplicate what a communication receiver "sees" when BPL signals are within its tuned range.
- C. The performance of the Agilent spectrum analyzers, at 3 kHz bandwidth, was within one (1) order of magnitude for signal sensitivity with respect to communication grade receivers. All plotted signals were more than 6 dB above the instrument noise floor.

I am attaching a file (extracted from the Cedar Rapids BPL Steering Committee report) that contains performance charts for modern communications receivers, as well as some of years past. Please note either the rated sensitivity levels or the levels at which acceptable signal-to-noise performance is achieved, but ONLY if there is no on-channel interference present. The actions and statements by the Commission to date on the BPL issue have been centered almost solely on radiated emissions compliance of the BPL systems and NOT on interference issues to spectrum users. Those users have communication antennas and receivers, not compliance antennas and spectrum analyzers. The situation at WOSR more

than amply demonstrates why notching does not work and why it will not work in its present form. It also should be an indicator of what will happen when BPL signals are even closer to spectrum users than the 180m separation at this site.

Thank you for your consideration of this information.

Sincerely,

Dale Svetanoff, Amateur Radio Licensee WA9ENA  
N.A.R.T.E Certified EMC Engineer, Cert. # EMC-001549-NE

<dgsvetan@rockwellcollins.com>

(319) 295-4928 Office  
(319) 462-5984 Home

(See attached file: Communication Receiver Characteristics.doc)

Make/Model	Description	Receive Frequency Tuning Range <sup>3</sup>	Rated/Measured Sensitivity @ Bandwidth <sup>3,4</sup> or Mode	Rated/Measured S-Meter Response <sup>3</sup>
Ten-Tec Orion	Current model deluxe transceiver	Dual receivers: 100 kHz to 30 MHz and all Amateur bands 1.8 through 29.7 MHz	Amateur band receiver, full range: <math>0.18 \mu\text{V}</math> typical for 10 dB S/N @ 2.4 kHz bandwidth	33 $\mu\text{V}$ @ 14 MHz = S-9, pre-amp on; 135 $\mu\text{V}$ @ 14 MHz = S-9, pre-amp off
Watkins-Johnson HF-1000	Mid-1990's deluxe receiver	5 kHz to 30 MHz	500 kHz to 30 MHz: 0.35 $\mu\text{V}$ for 16 dB S+N/N @ 300 Hz bandwidth (CW mode), pre-amp off	Meter is calibrated in dBm, not S-units; -73 dBm (50 $\mu\text{V}$ ) input @ 14 MHz = reading of -85 dBm.
Yaesu FT-857	Current model wide range transceiver	100 kHz to 56 MHz; 76 to 108 MHz; 118 to 164 MHz; 420 to 470 MHz	1.8 to 30 MHz: <math>0.2 \mu\text{V}</math>; 50 to 54 MHz: <math>0.13 \mu\text{V}</math> - CW/SSB modes in both ranges	6.6 $\mu\text{V}$ @ 14.2 MHz = S-9, pre-amp on; 17 $\mu\text{V}$ @ 14.2 MHz = S-9, pre-amp off; 5.3 $\mu\text{V}$ @ 52 MHz = S-9, pre-amp on; 14 $\mu\text{V}$ @ 52 MHz = S-9, pre-amp off.
Yaesu FT-1000 MP Mark-V Field	Current model deluxe transceiver	100 kHz to 30 MHz	1.8 to 30 MHz: <math>0.16 \mu\text{V}</math> @ 2.0 kHz bandwidth - SSB/CW modes	48 $\mu\text{V}$ @ 14.2 MHz = S-9, pre-amp on; 135 $\mu\text{V}$ @ 14.2 MHz = S-9, pre-amp off

<sup>3</sup> Information taken from manufacturer's specification sheets or from ARRL test lab reports. In some cases, S-meter performance will vary by band or frequency range.

<sup>4</sup> Rated bandwidth information is from ARRL test lab reports, when available. In some cases, no information is available to indicate the bandwidth used for determining performance specifications.

**James Burtle**

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**From:** Jim Spencer [jlscr@mchsi.com]  
**Sent:** Thursday, October 14, 2004 12:48 PM  
**To:** James Burtle  
**Cc:** Wade Walstrom; Ed Hare W1RFI  
**Subject:** Re: BPL Notching--Actual Experience  
Mr. Burtle:

Thank you for responding. From the text of my message you can see I was describing a JOINT effort with the system operator. My purpose in sending the letter to various FCC officials was to make the case that in a well-documented actual BPL operating environment, notching DID NOT work. Various quotes I've seen lead me to understand that the FCC believes "notching" will indeed solve BPL harmful interference problems. I have proof that it does not.

James L. Spencer

----- Original Message -----

**From:** James Burtle  
**To:** Jim Spencer  
**Sent:** Wednesday, October 13, 2004 10:03 AM  
**Subject:** RE: BPL Notching--Actual Experience

Mr. Spencer,

I have received you complaint. Please make sure that you send a copy of all your complaints to the system operator.

Jim Burtle

\*\*\* Non-Public: For Internal Use Only \*\*\*

-----Original Message-----

**From:** Jim Spencer [mailto:jlscr@mchsi.com]  
**Sent:** Thursday, October 07, 2004 5:19 PM  
**To:** Anh Wride; Alan Stillwell; Riley Hollingsworth; James Burtle; Sheryl Wilkerson  
**Cc:** Ed Hare W1RFI; Wade Walstrom  
**Subject:** BPL Notching--Actual Experience

I have seen numerous references made by the promoters of BPL stating that notching (or shifting frequency) techniques can be used to eliminate interference to licensed services using the HF spectrum. Speaking from actual experience, I can tell you that this IS NOT TRUE.

I would add that the BPL interference I experienced was caused by an extremely simple test environment consisting of just four overhead nodes and three spans--just three sets of spread-spectrum frequencies. Any real-world deployment would be much more difficult to deal with.

Alliant Energy in Cedar Rapids, Iowa started an evaluation of an Amperion system on March 30,

10/21/2004

2004. I immediately observed extensive interference on most amateur frequencies at my home, some 600 feet away from the nearest node of the BPL system. I went to the test site where they were installing the last node and talked to the Amperion engineer, Tom Luecke. He verified that the frequencies where I found the interference were indeed caused by BPL. He also stated that the gains were set at a lower level to reduce interference and that the 20, 17, 15, 12 and 10 meter amateur bands were notched. Still, I had strong interference at or near S9 on at least part of all the notched bands! In addition, I had interference on the 40 and 30 meter bands. The true extent of the interference could not be determined due to unresolved power-line noise. The notching DID NOT WORK.

On May 25, 2004 I received a request from Alliant Energy asking that I again check my radio for BPL interference. They had received an email from Greg Solt at Amperion which stated: "we have gone back to re-evaluate the effectiveness of the notch filters that we activated in your system. We found that due to changes in some notching methods associated with our software packages, these notches were not working as efficiently as we would like and, in some cases, not working at all. The notches have now been fixed and verified as working correctly. We hope that this will address Mr. Spencer's concerns". I ran a scan of all HF amateur bands and found and reported the following: No BPL above the S9 power-line noise on 160 and 80 meters. On 40 meters I had S7 to S9 BPL. On 30, 20, 17 and 15 meters the BPL was S8 to S9. It was S3 on 12 meters and S8 on 10 meters. Clearly, the notching DID NOT WORK.

On June 1, 2004 I was contacted by Alliant Energy and asked to repeat my tests as the notching had been changed again. I ran the tests on that day and reported to Alliant the following levels of BPL interference: No BPL was detected on 160 and 80 meters in S9+ power-line noise. BPL interference was S8 to S9 on 40 meters, S7 on 30 meters, S9 on 20 meters, S8 on 17 meters, S8 to S9 on 15 meters, S8 on 12 meters. No BPL signals could be heard on 10 meters in S7 to S8 power-line noise. Clearly this notching configuration DID NOT WORK.

In a telephone conversation with Alliant Energy on June 4, 2004, I told them that the BPL frequencies had moved although they stated there had been no changes in the notching since before the June 1 tests. They later confirmed that the notching had indeed been changed. I ran a full set of tests and provided the results to Alliant on June 4. It showed no observable BPL on 160 meters in S9 + 20 db power-line noise and no BPL on 80 meters in S9 + 5 db power-line noise. On 40 meters the BPL signals were S8 to S9. On 30 meters the BPL signals were S8. On 20 meters there were no observable BPL signals above the S8 power-line noise. On 17 meters there were no BPL signals above S4 power-line noise. On 15, 12 and 10 meters there were no BPL signals in near zero power-line noise. In this case, notching partially worked but still caused significant interference to at least two amateur bands that I often use.

What they did in the last case would not work with a "real" BPL deployment. They had simply moved two of the three spread-spectrum ranges above 30 MHz to the Low VHF bands. The important point here is, what would they do with a system with four spans? Or five? Or more as you would have in any "real" BPL system? Clearly there are not enough frequencies available to deploy a real operating BPL system and not interfere with amateurs and other licensed users of the HF and Low VHF spectrum.

The bottom line: At least with this Amperion system, notching DID NOT WORK.

Sincerely,

James L. Spencer, W0SR  
3712 Tanager Dr. NE  
Cedar Rapids, Iowa 52402

COMMENT TO DOC# 04-37

Report of Harmful Interference From a Broadband Over Power Line Trial  
or Deployment

Name of complainant: Tom Schrum

Call sign (if applicable): K7NII

Station location: ROCKING CHAIR ROAD, COTTONWOOD, ARIZONA

Mailing address (if different): 406 YAQUI CIRCLE, CAMP VERDE, ARIZONA

City, State, Zip: ↑

Telephone: 928-567-3134 Email: N/A

Description of Interference: VERY HIGH NOISE FLOOR + PULSES MAKING  
RECEPTION OF THE 10.368 TEST BEACON USELESS

Description of station: 10.368GHz PREAMPS/MIXER (+28MHz POST-AMP  
& LOW PASS FILTER) (INTERFERENCE ENTERING AT 28MHz IF FREQ)

Receiver(s) affected: YAESU FT-817 USED AS 28MHz IF RECEIVER

Antenna type: 25" DISH

Antenna location: ROCKING CHAIR ROAD - COTTONWOOD, ARIZONA

Distance of antenna from own house (feet): PORTABLE STATION

Distance of antenna from neighboring houses (feet):  
FIVE

Distance of antenna from power distribution line or equipment  
(feet): 100'

COMMENT ON 04-37

Log of interference:

Date	Time	Frequency	Receive Mode	Interfering signal strength	Description
May 19, 2004	9:02 AM - 11:30 PM	10.368942	C.I.D.	TOTAL SATURATION of 28 MHz IF BAND	Light noise floor accompanied by puffs & garbled sounding reception across

PLEASE CEASE OFFICER'S OPERATION

SO WE CAN CONTINUE OUR TESTING

Thank you

Tom Soltman (K7W1)



James Burtle

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From: Ernie & Betsy Cummings [k6xf@commspeed.net]  
Sent: Wednesday, June 16, 2004 11:11 PM  
To: Anh Wride; Alan Stillwell; Riley Hollingsworth; James Burtle  
Subject: Interference from Broadband Over Power Line Transmission  
To: Federal Communications Commission

From: Floyd E. Cummings - K6XF (Ernie)  
Subject: Report of Harmful Interference  
from a Broadband Over Power Line Transmission  
COTTONWOOD, ARIZONA 86326

**Please open the attached file in MS Word**

Please reply to this E-Mail at:

[k6xf@commspeed.net](mailto:k6xf@commspeed.net)

or

[ernie@cummings.net](mailto:ernie@cummings.net)

Thank You....

**Report of Harmful Interference From a Broadband Over Power Line Transmission  
COTTONWOOD, ARIZONA 86326**

Name of complainant: Floyd E. Cummings (Ernie)

Call sign: K6XF

Station location: 133 Lampliter Village

City, State, Zip: Clarkdale, AZ 86324

Telephone: 928-649-3562

Email: [ernie@cummings.net](mailto:ernie@cummings.net) - [k6xf@commspeed.net](mailto:k6xf@commspeed.net)

Description of Interference: Strong interference over-riding WWW on 10 & 15 Mhz

The 20 meter Amateur Radio Band on USB reception was unusable due to BPL

Description: Mobile operation with a Panasonic RF-2200 Receiver 8 Band

1.7 to 30 MHZ double Superhetrodyne (rated excellent HF receiver)

Antenna: 38 inch Whip

Distance of antenna from power distribution line: 20 to 2500 feet

. At 20 feet signal was max meter scale at 2500 feet signal half scale

Log of interference:

Date	Time MST	Frequency Mhz	Receive Mode	Interfering signal strength	Description
5-31-04	10:45 AM	11.4 to 16	AM	Meter Full scale	Continuous broadband carrier with Modulating data sounds 2030 Cherry St Cottonwood, AZ
6-08-04	9:30 AM	10 to 16	AM	Meter Full scale	Continuous broadband Carrier with Modulating Data sounds 1600 Block Cottonwood Street Cottonwood, AZ 86326

Federal Communication Commission  
Attn: James R, Burtle  
Chief, Experimental Licensing Branch  
Room 7-A267  
445 12<sup>th</sup> Street SW  
Washington, DC 20024  
Dated June 17, 2004

*Clinton Pierce*

RECEIVED & INSPECTED  
JUN 25 2004  
FCC - MAILROOM

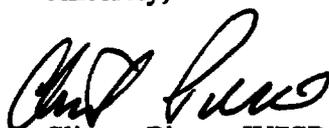
Dear Sir:

**This is a complaint against interference Amateur Hams Bands from Broadband Power Line System**

I have seen the Broadband Power Lines Transmission System (BPL) create a condition where parts of the Amateur Radio Bands Frequencies are totally unusable. This is wrong. It is creating direct interference with frequencies that have been use by amateur radio operators for over 50 years. It is directly interfering with any emergency operation that may take place on these bands. This can effect Police and Fire Departments communications from harmonics created by being too close to the power lines.

The attached data which I personally wittness as it was taken. This BPL operation on the power is wrong and should be stop. The power lines were designed for electric power and not for some system to radiated RF signals that will interfere with other frequencies that are being used. The Federal Communication Commission should put a stop to this type of operation. How can any one approve this type of operation without knowing what damage it causes.

Sincerely,

  
Clinton Pierce W7SRC  
PMB 445  
11881 S Fortuna Rd  
Yuma, AZ 85367

**Report of Harmful Interference From a Broadband Over Power Line Trial  
or Deployment**

Name of complainant: Clinton L Pierce  
 Call sign (if applicable): WTSRC  
 Station location: See DATA sheets  
 Mailing address (if different): PMB 445 11881 S FORTUNA RD  
 City, State, Zip: Yuma, AZ 85367  
 Telephone: 602-448-3265 Email: BOOTSIE1@DIRECTWAY.COM  
 Description of Interference: POWER LINE INTERFERENCE  
on many Ham Radio Bands  
 Description of Description of your station

Receiver(s) KEUWOOD TS-450S  
 affected: YAESU FT 897  
 Antenna

type: WEBSTER BANDSPANNER  
 Antenna

location: ON TOP OF CAR AT LOCATIONS ON DATA SHEETS  
 Distance of antenna from own house (feet):

Distance of antenna from neighboring houses (feet):

Distance of antenna from power distribution line or equipment

(feet): AMERICAN HERITAGE 25200 FT Sawmill 2700 ft

Log of interference:

Date	Time	Frequency	Receive Mode	Interfering signal strength	Description
<u>SEE</u>	<u>DATA</u>	<u>Sheets</u>			

DATE: JUNE 17, 2004

DATA LOCATION: COTTONWOOD, ARIZONA AIRPORT N34.735 DEG W112.039 DEG

SYSTEM MANUFACTURE HF UNIT	FREQUENCY	SIGNAL STRENGTH	OPERATION MODE
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10 METER BAND

KENWOOD	28.500 MHZ	S4	USB
YEASU	28.500 MHZ	<S1	USB
YEASU	28.500 MHZ	<S1	FM
KENWOOD	28.500 MHZ	S5	FM

12 METER BAND

KENWOOD	24.900 MHZ	S2	USB
KENWOOD	24.900 MHZ	S3	FM
YEASU	24.900 MHZ	<S1	USB
YEASU	24.900 MHZ	<S1	FM

15 METER BAND

KENWOOD	21.305 MHZ	S1	USB
KENWOOD	21.305 MHZ	0S	FM
YEASU	21.305 MHZ	0S	USB
YEASU	21.305 MHZ	0S	FM

17 METER BAND

YEASU	18.130 MHZ	0S	USB
YEASU	18.130 MHZ	0S	FM
KENWOOD	18.130 MHZ	S1	USB
KENWOOD	18.130 MHZ	S2	FM

20 METER BAND

KENWOOD	14.240 MHZ	S6	USB
KENWOOD	14.240 MHZ	S9	FM
YEASU	14.240 MHZ	S4	USB
YEASU	14.240 MHZ	S1-S2	FM

40 METER BAND

KENWOOD	7.260 MHZ	S1	LSB
KENWOOD	7.260 MHZ	S2	FM
YEASU	7.260 MHZ	S2	LSB
YEASU	7.260 MHZ	S2	FM

80 METER BAND

YEASU	3.980 MHZ	S2	LSB
YEASU	3.980 MHZ	S3	FM
KENWOOD	3.980 MHZ	S7	LSB
KENWOOD	3.980 MHZ	S9	FM

LSB (LOWER SIDE BAND)  
USM (UPPER SIDE BAND)  
FM (FREQUENCY MODUALTION)

KENWOOD UNIT TS-450S MODEL  
YEASU UNIT FT-897 MODEL

DATE: JUNE 17, 2004

DATA LOCATION: AMERICAN HERITAGE, ARIZONA

N34.73272 DEG W112.00520 DEG

SYSTEM MANUFACTURE HF UNIT	FREQUENCY	SIGNAL STRENGTH	OPERATION MODE
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10 METER BAND

KENWOOD	28.500 MHZ	20 DB OVER S9	USB
YEASU	28.500 MHZ	70--80 DB OVER S9	USB
YEASU	28.500 MHZ	METER PEGGED	FM
KENWOOD	28.500 MHZ	60 DB OVER S9	FM

12 METER BAND

KENWOOD	24.900 MHZ	S3	USB
KENWOOD	24.900 MHZ	S3	FM
YEASU	24.900 MHZ	0	USB
YEASU	24.900 MHZ	0	FM
YEASU	24.900 MHZ	0	PACKET

15 METER BAND

KENWOOD	21.305 MHZ	59 DB OVER S9	USB
KENWOOD	21.305 MHZ	60 OVER S9	FM
YEASU	21.305 MHZ	65 DB OVER S9	USB
YEASU	21.305 MHZ	95 DB OVER S9	FM
YEASU	21.305 MHZ	95 DB OVER S9	PACKET

17 METER BAND

YEASU	18.130 MHZ	0	USB
YEASU	18.130 MHZ	0	FM
KENWOOD	18.130 MHZ	S5	USB
KENWOOD	18.130 MHZ	S3	FM
YEASU	18.130 MHZ	0	PACKET

20 METER BAND

KENWOOD	14.240 MHZ	30 DB OVER S9	USB
KENWOOD	14.240 MHZ	60 DB OVER S9	FM
YEASU	14.240 MHZ	85 DB OVER S9	USB
YEASU	14.240 MHZ	METER PEGGED	FM

40 METER BAND

KENWOOD	7.260 MHZ	10 DB OVER S9	LSB
KENWOOD	7.260 MHZ	60 DB OVER S9	FM
YEASU	7.260 MHZ	58 DB OVER S9	LSB
YEASU	7.260 MHZ	82 DB OVER S9	FM
YEASU	7.260 MHZ	82 DB OVER S9	PACKET

80 METER BAND

YEASU	3.980 MHZ	55 DB OVER S9	LSB
YEASU	3.980 MHZ	65 DB OVER S9	FM
KENWOOD	3.980 MHZ	10 DB OVER S9	LSB
KENWOOD	3.980 MHZ	60 DB OVER S9	FM

LSB (LOWER SIDE BAND)  
 USM (UPPER SIDE BAND)  
 FM (FREQUENCY MODULATION)  
 PACKET (PACKET RADIO)

KENWOOD UNIT TS-450S MODEL  
 YEASU UNIT FT-897 MODEL

DATE: JUNE 17, 2004

DATA LOCATION: SAWMILL, ARIZONA

N34.72843 DEG W112.00575 DEG APPROXIMATELY 1/2 MILE FROM BPL SITE

SYSTEM MANUFACTURE HF UNIT	FREQUENCY	SIGNAL STRENGTH	OPERATION MODE
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10 METER BAND

KENWOOD	28.500 MHZ	S4	USB
YEASU	28.500 MHZ	40 DB OVER S9	USB
YEASU	28.500 MHZ	40 DB OVER S9	FM
KENWOOD	28.500 MHZ	S9	FM
YEASU	28.500 MHZ	40 OVER S9	PACKET

12 METER BAND

KENWOOD	24.900 MHZ	S1	USB
KENWOOD	24.900 MHZ	S1	FM
YEASU	24.900 MHZ	0	USB
YEASU	24.900 MHZ	0	FM

15 METER BAND

KENWOOD	21.305 MHZ	S2	USB
KENWOOD	21.305 MHZ	S5	FM
YEASU	21.305 MHZ	0	USB
YEASU	21.305 MHZ	0	FM

17 METER BAND

YEASU	18.130 MHZ	0	USB
YEASU	18.130 MHZ	0	FM
KENWOOD	18.130 MHZ	S1	USB
KENWOOD	18.130 MHZ	S3	FM

20 METER BAND

KENWOOD	14.240 MHZ	S7	USB
KENWOOD	14.240 MHZ	60 DB OVER S9	FM
YEASU	14.240 MHZ	50 DB OVER S9	USB
YEASU	14.240 MHZ	65 OVER S9	FM

40 METER BAND

KENWOOD	7.250 MHZ	40-50 DB OVER S9	LSB
KENWOOD	7.250 MHZ	40 DB OVER S9	FM
YEASU	7.250 MHZ	S7	LSB
YEASU	7.250 MHZ	20 DB OVER S9	FM

80 METER BAND

YEASU	3.980 MHZ	70 DB OVER S9	LSB
YEASU	3.980 MHZ	METER PEGGED	FM
KENWOOD	3.980 MHZ	10 DB OVER S9	LSB
KENWOOD	3.980 MHZ	METER PEGGED	FM
YEASU	3.980 MHZ	METER PEGGED	PACKET

LSB (LOWER SIDE BAND)  
 USM (UPPER SIDE BAND)  
 FM (FREQUENCY MODULATION)  
 PACKET (PACKET RADIO)

KENWOOD UNIT TS-450S MODEL  
 YEASU UNIT FT-897 MODEL

James Burtle

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From: Clinton Pierce [bootsie1@direcway.com]

Sent: Thursday, August 05, 2004 11:49 PM

To: James Burtle

Cc: ernie@cummings.net

Subject: Re: Received your complaint

My complaint is to you and it is your responsibility to solve the problem when you have been given all the proof of their violation and direct interference on other frequencies. It appears that no study by the FCC on this matter and to ignore direct interference which has been filed by many others, is wrong. FCC has the charter to protect all frequencies. This is not being done.

Clinton Pierce

— Original Message —

From: James Burtle

To: bootsie1@direcway.com

Sent: Thursday, August 05, 2004 5:25 AM

Subject: Received your complaint

Mr. Pierce,

We have received your complaint of interference to amateur radio from a Broadband Over Powerline (BPL) experiment. If you have not done so, please send your interference complaint to the BPL system operator in order to afford him/her an opportunity to remedy the problem. We have noted your complaint, but will not be taking action until we are sure that the system operator has been notified and given ample opportunity to fix the problem.

If the interference still exists after you have given the system operator has had ample opportunity to fix the problem please forward your complaint to the FCC. Please include details such as correspondence that you have sent to and received from the operator.

Thank you,

Jim Burtle

Chief, Experimental Licensing Branch

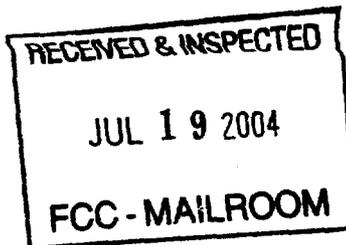
Office of Engineering and Technology

Federal Communications Commission

Outgoing mail is certified Virus Free.

Checked by AVG anti-virus system (<http://www.grisoft.com>).

Version: 6.0.732 / Virus Database: 486 - Release Date: 7/29/2004



June 17, 2004

James R. Burtle  
Chief, Experimental Licensing Branch  
Room 7-A267  
445 12th Street SW  
Washington, DC 20024

Dear Sir,

I am a General class amateur radio operator and today visited Cottonwood, Arizona, which is a test site for BPL by Electric Broadband LLC and APS. I measured strong interference at several places in Cottonwood and on most amateur HF bands (see attached).

The interference is continuous, extremely strong, and across the entire affected bands making them completely useless. I am writing to you as the deadline for comments is June 22, 2004, and the BPL company has only recently begun operation in Cottonwood. By the terms of their temporary license, they are required to cease operation, or mitigate the interference immediately and I believe it falls to the FCC to enforce the terms of this license.

Respectfully submitted,

  
Robert B. Thompson, KC8BOB  
5290 Williamson Valley Road  
Prescott, Arizona 86305  
(928)-771-9517  
kc8bob@cableone.net

Radio: Yaesu FT-897                      Antenna: Webster Bandsparner  
 Operators: Greg Allen N6WCD, Steven Pearson KC7TIL, Robert Thompson KC8BOB

Cottonwood Airport Baseline                      Location: 34.735N                      112.039W                      Mobile

Band (m)	Frequency MHz	Signal Level	Mode	Time:	0830
10	28.500	S0	USB		
10	28.500	S0	FM		
12	24.900	S0	USB		
12	24.900	S0	FM		
15	21.305	S0	USB		
15	21.305	S0	FM		
17	18.130	S0	USB		
17	18.130	S0	FM		
20	14.240	S4	USB		
20	14.240	S1-S2	FM		
40	7.260	S2	LSB		
40	7.260	S2	FM		
80	3.980	S2	LSB		
80	3.980	S3	FM		

American Heritage Academy                      Location: 34.73272N                      112.00520W                      Mobile

Band (m)	Frequency MHz	Signal Level	Mode	Time:	0915
80	3.980	S9+55dB	LSB		
80	3.980	S9+65dB	FM		
40	7.260	S9+58dB	LSB		
40	7.260	S9+82dB	FM		
40	7.260	S9+82dB	Packet		
20	14.240	S9+85dB	USB		
20	14.240	Full Scale	FM		
17	18.130	S0	USB		
17	18.130	S0	FM		
17	18.130	S0	Packet		
15	21.305	S9+65dB	USB		
15	21.305	S9+95dB	FM		
15	21.305	S9+95dB	Packet		
12	24.900	S0	USB		
12	24.900	S0	FM		
12	24.900	S0	Packet		
10	28.500	S9+75dB	USB		
10	28.500	Full Scale	FM		

Sawmill Cove Apartments

Location: 34.72843N 112.00575W Mobile

Band (m)	Frequency MHz	Signal Level	Mode	Time:	1015
10	28.500	S9+40dB	USB		
10	28.500	S9+40dB	FM		
10	28.500	S9+40dB	Packet		
12	24.900	S0	USB		
12	24.900	S0	FM		
15	21.305	S0	USB		
15	21.305	S0	FM		
17	18.130	S0	USB		
17	18.130	S0	FM		
20	14.240	S9+50dB	USB		
20	14.240	S9+65dB	FM		
40	7.250	S9+45dB	LSB		
40	7.250	S9+40dB	FM		
80	3.980	S9+70dB	LSB		
80	3.980	Full Scale	FM		
80	3.980	Full Scale	Packet		

Radio: Kenwood TS-450S      Antenna: Webster Bandsparner  
 Operators: Steven Pearson KC7TIL, Robert Thompson KC8BOB, Greg Allen N6WCD

Cottonwood Airport Baseline      Location: 34.735N      112.039W      Mobile

Band (m)	Frequency MHz	Signal Level	Mode	Time:	0830
10	28.500	S4	USB		
10	28.500	S5	FM		
12	24.900	S2	USB		
12	24.900	S3	FM		
15	21.305	S1	USB		
15	21.305	S0	FM		
17	18.130	S1	USB		
17	18.130	S2	FM		
20	14.240	S6	USB		
20	14.240	S9	FM		
40	7.260	S1	LSB		
40	7.260	S2	FM		
80	3.980	S7	LSB		
80	3.980	S9	FM		

American Heritage Academy      Location: 34.73272N      112.00520W      Mobile

Band (m)	Frequency MHz	Signal Level	Mode	Time:	0915
80	3.980	S9+10db	LSB		
80	3.980	S9+60dB	FM		
40	7.260	S9+10dB	LSB		
40	7.260	S9+60dB	FM		
20	14.240	S9+20dB	USB		
20	14.240	S9+80dB	FM		
17	18.130	S5	USB		
17	18.130	S3	FM		
15	21.305	S9	USB		
15	21.305	S9+80dB	FM		
12	24.900	S3	USB		
12	24.900	S3	FM		
10	28.500	S9+20dB	USB		
10	28.500	S9+80dB	FM		