

CEDAR RAPIDS, IOWA, BPL Trial System Radio Frequency Interference Tests

Sponsored by:

Cedar Rapids BPL Steering Committee
June 18, 2004

1. EXECUTIVE SUMMARY

A series of tests were conducted during April and May, 2004, in the northeast quadrant of Cedar Rapids, Iowa, to demonstrate the extent to which Broadband over Power Line ("BPL") signals (from a trial system) interfere with Amateur Radio communications in the medium frequency ("MF") and high frequency ("HF") electromagnetic spectrum. The data was collected using the normal, installed antennas of a typical Amateur Radio station.

These tests show that BPL signal levels from a system located nearly 200 meters from the Amateur Radio station are more than strong enough to severely interfere with normal communications in the 1.8 to 30 MHz frequency range. Signal level comparisons are shown for critical spectrum areas both with and without the BPL signals being present. The antennas and radio equipment used in the affected station are neither special nor uncommon; the equipment has the requisite sensitivity for effective MF and HF communications. The spectrum analyzer used to collect the data had performance characteristics slightly less sensitive to those of the radio station's transceiver (combination transmitter and receiver unit – only the receive characteristics are considered in this report).

2. INTRODUCTION

The Cedar Rapids, IA, BPL Steering Committee ("BPLSC") sponsored a series of tests to demonstrate the degree of radio frequency interference ("RFI") occurring to a licensed Amateur Radio station located near, but not directly adjacent to, the BPL trial site of Alliant Energy.

Tests by Metavox and NTIA have been conducted to show either compliance of BPL systems to applicable FCC Part 15 limits or to model or demonstrate the area over which interference from typical BPL trial system emissions¹ occurs or may occur.

¹ Examples include: "BPL Trial Systems Electromagnetic Emissions Tests", Metavox, Inc., March 20, 2004. Submitted by American Radio Relay League as Exhibit A in NPRM filing to Docket 04-37; "Potential Interference from Broadband Over Power Line (BPL) Systems to Federal Government Radio Communications at 1.7 to 80 MHz – Phase 1 Study, Volumes 1 and 2", U.S. Department of Commerce, NTIA Report 04-413, April 27, 2004.

While Part 15 contains measurement standards and electromagnetic limits (which are not addressed by this report), it is the intent of this report to assess compliance with Part 15 in its entirety. The Amateur Radio Service is an FCC - licensed service under Part 97 of the FCC regulations. The BPL system currently being tested by Alliant Energy is regulated by Part 15 of the same FCC regulations. Part 15 of the FCC regulations clearly stipulate that, "Parties responsible for equipment compliance should note that the limits specified in this part will not prevent harmful interference under all circumstances." (§15.15 General technical requirements. (c)) and that, "Operation of an intentional, unintentional, or incidental radiator is subject to the conditions that no harmful interference is caused..." (§ 15.5 General conditions of operation. (b)).

The subject tests of this paper were performed using the actual installed antennas of the Amateur Radio station. This test approach correctly characterizes the harmful interference that is afflicting this Amateur Radio station.

This effort consisted of measuring the *effect* on MF and HF communication systems from the radiated emissions of overhead power line systems carrying trial Broadband over Power Line ("BPL") service. The subject system was frequently idling and not carrying continuous data at the time of the tests². Although power companies have transmitted status and control signals over their power lines for many years using the VLF spectrum (and not producing any significant interference to other services), BPL is a recent expansion of that concept in which broadband data is sent using the MF and HF spectrum. BPL systems use digital signal communications of wide bandwidth. Tests were conducted by Alliant Energy² using a trial BPL system deployed to test BPL concepts and hardware. The trial system hardware is supplied by Amperion, and it is located in the northeast quadrant of Cedar Rapids, IA. The system under study occupied spectrum in the frequency region from approximately 1.7 MHz (just above the AM broadcast band) to 30 MHz at the time of the tests.

The purpose of the tests conducted is to measure the signal level, due to BPL radiated emissions, as they appear at the operating position of an active Amateur Radio station. All signals measured, regardless of source, were as intercepted by the various antennas of the licensed Amateur Radio station. The antennas are for use in the Amateur Service MF and HF bands, and are typical of types in general use. It is important to note that these are not measurement antennas, but *communication* antennas.

The testing conducted was designed to determine the extent to which *normal, generally used, communication antennas* are capable of delivering signals that cause severe interference to routine Amateur Radio Service MF and HF communications. It was noted that Alliant Energy conducted on-site emissions measurement tests during the time period the data for this report was taken. (This data has not been made available to the BPLSC by date of this report.) It is presumed that the subject trial BPL system was operating within current allowable FCC Part 15 limits at the time of our tests. At the request of the

² Private communication between Mr. James Spencer, WØSR, and representatives of Alliant Energy.

BPLSC representative, Mr. James Spencer, Alliant Energy twice commanded the BPL system to shut down for a two (2) hour period in order that baseline "no BPL signal" measurements could be made.

The tests were performed during April and May, 2004, with specific dates given in the data presentations. The subject BPL trial system was activated on or about March 30, 2004, along a portion of Glass Road, in the northeast quadrant of Cedar Rapids Iowa. The tests were conducted at the residence of Mr. James Spencer, WØSR, located at 3712 Tanager Drive NE, Cedar Rapids, IA, 52402. Mr. Spencer's radio operations room is located on the lower level of his home. This location would tend to minimize the coupling of external fields directly into the radio equipment. The test equipment was set up in the radio operations room, and all measurements were made using the same coaxial cable that normally connects to Mr. Spencer's main MF and HF transceiver.

The results of the BPLSC tests are tabulated in Appendix 1, Part A: Test Data Plots, and a description of the testing and test site is provided in the following sections.

3. THE TEST SITE

The Alliant Energy trial BPL system includes a segment of overhead medium voltage distribution lines, as well as a short segment of buried medium voltage distribution lines. This BPL system is configured to interface with subscribers via Wi-Fi (antenna located on each test unit), and the system runs along Glass Road. Figure 3-1 is a map which shows the geographic relationship between the BPL trial system along Glass Road and Mr. Spencer's residence. The map shows the location of the BPL trial system hardware as it existed at the time of testing, and it helps to understand the location of Mr. Spencer's residence and antenna system relative to both the actual BPL trial lines and other neighborhood power distribution lines that connect to the BPL trial lines, but which are not intentional data carriers at this time.

Note that the Spencer residence is not located directly adjacent to any lines carrying the BPL test signals. Mr. Spencer's antennas are approximately 183 meters (600 feet) from the Glass Road lines. They are approximately 30.5 meters (100 feet) from the distribution line which runs just northwest of the property.

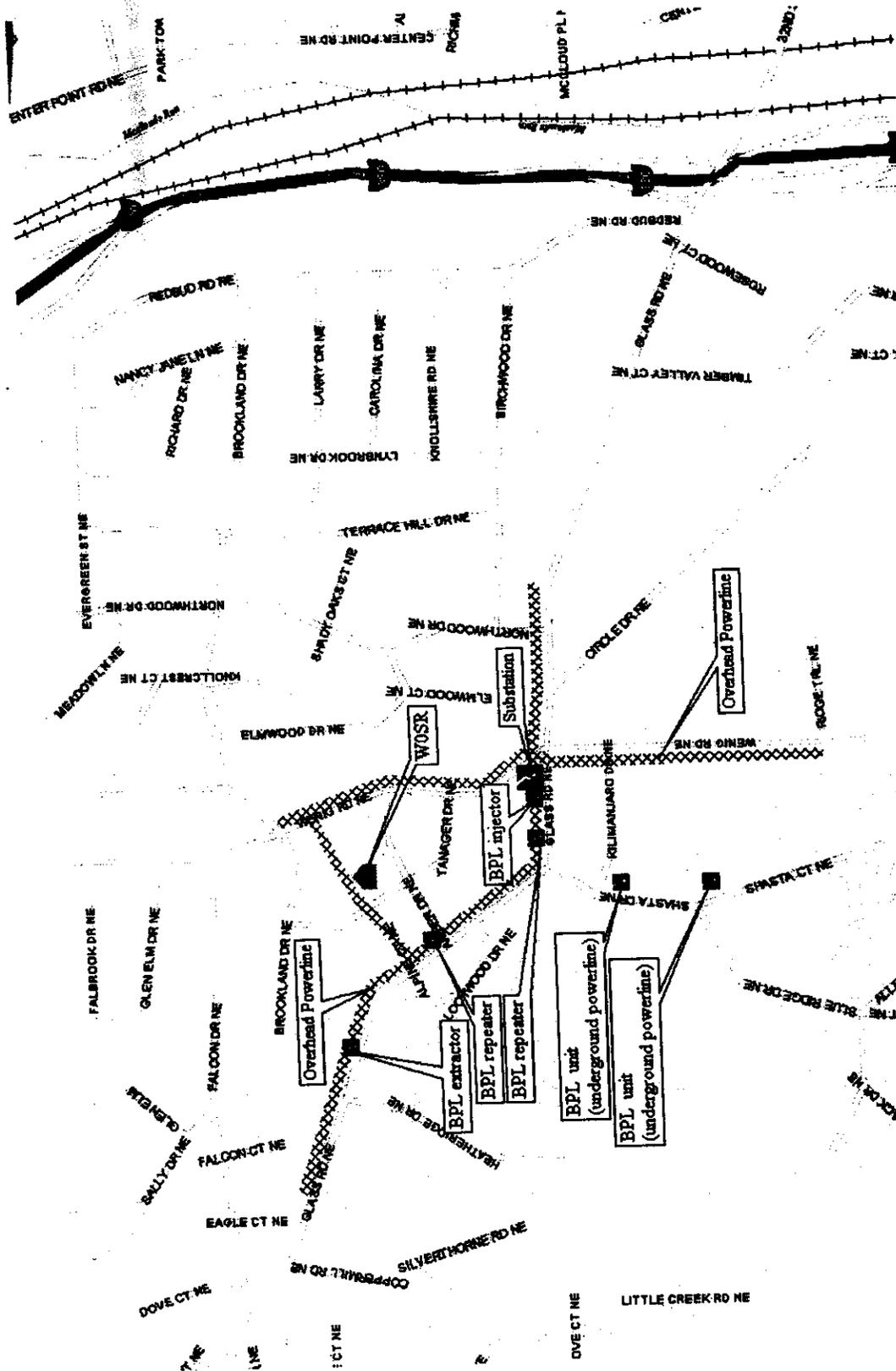


Figure 3-1: Map of BPL trial area and location of the W0SR station and residence (North is top of map.)

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The actual BPL hardware nearest to Mr. Spencer's Amateur Radio station is at the intersection of Glass Road and Amber Drive, shown below. (The BPL repeater is the gray box located on the right hand side of the power pole, near the top.)



Figure 3-2: BPL Repeater at intersection of Glass Road and Amber Drive

This location is southwest of the Spencer residence. Figure 3-3 is a view taken from Mr. Spencer's property looking toward the northeast. The roadway extending across the picture, in the foreground, is Tanager Drive, which runs approximately northwest-southeast in this area and is generally parallel to Glass Road. The intersecting roadway is Amber Drive. The power lines carrying the BPL signals along Glass Road are visible in the background.

Figure 3-4 is a view of Mr. Spencer's residence looking toward it from the direction of the Amber Drive-Tanager Drive intersection. Not clearly visible, but present in the background of this photo, are another set of overhead power lines which run approximately east-west (shown in Figure 3-1 map in blue) and appear to be a branch-off from the Glass Road lines. (A small portion of the branch power line is visible in the area just above the house roof.)



Figure 3-3: Intersection of Amber Drive and Tanager Drive, as viewed from the Spencer residence



Figure 3-4: View of the Spencer residence showing front of the house and the back yard antenna tower. Other neighborhood distribution lines are visible above the house roof, in the open sky area.



Figure 3-5: View to the west from Tanager Drive, looking toward Glass Road. These power lines are connected to Glass Road lines, but are not equipped with BPL communications hardware boxes. These lines are just west of the Spencer residence.



Figure 3-6: View to the east from Glass Road looking toward Tanager Drive. This is the connection point for the above circuit.

Figure 3-7 shows the antenna support tower and some of the antennas used in the operation of station WØSR. This view is toward the front of the house.



Figure 3-7: View from Tanager Drive of WØSR antenna tower

The antennas and related hardware in use at WØSR are as follows:

- ❖ Tower: Commercial self-supporting steel type, 48 feet overall height
- ❖ Antenna mounting: Side arms on tower for wire antennas; rotating mast for the Tri-Band Beam and WARC Dipole.
- ❖ 160 m Antenna (1.8 to 2.0 MHz): Inverted-L (wire) supported by the tower at 46 feet, coax is RG-58, 32 feet long. This antenna runs from the tower at a compass bearing of approximately 240 degrees.
- ❖ 80m/40m Inverted-Vee (3.5 to 4.0 MHz and 7.0 to 7.3 MHz): Two dipoles (wires cut to resonate at about 3.8 and 7.15 MHz, respectively) supported at their apex by the tower at 47 feet, fed from a single RG-213 coax, 75 feet long. The 80m antenna runs at a compass bearing of approximately 20/200 degrees, and the 40m runs at 110/290 degrees.
- ❖ Tri-Band Beam³: Hy-Gain™ TH7-DXX (Yagi-type) at 49 feet fed with RG-213 coax, 75 feet long. This antenna is rotatable.
- ❖ WARC Dipole⁴: Cushcraft™ D3W rotatable dipole at 54 feet fed with RG-213 coax, 80 feet long. The antenna is a single element dipole which

³ "Tri-Band Beam" refers to a common antenna configuration which provides operation on three (3) of the Amateur Radio Service HF bands: 20m (14.0 to 14.35 MHz), 15m (21.0 to 21.45 MHz), and 10m (28.0 to 29.7 MHz). The antenna design is such that it uses multiple elements on each band so as to provide forward power gain over a single element dipole antenna.

⁴ "WARC Dipole" refers to a common antenna configuration designed to provide operation on the three (3) bands allocated to the Amateur Radio Service during the World Administrative Radio Conference ("WARC") of 1979. These bands are at 30m (10.1 to 10.15 MHz), 17m (18.068 to 18.168 MHz), and 12 m (24.89 to 24.99 MHz).

employs traps as tuned elements for each of the bands. It is mounted above the Tri-Band Beam on the tower mast and is orthogonal to the orientation of the Tri-Band Beam.

- ❖ 80/40 Vertical (3.5 to 4.0 MHz and 7.0 to 7.3 MHz) : Butternut™ HF-2V, ground mounted, fed with 45 feet RG-213 coax, and fitted with approximately 60 radials buried just below the surface of the ground.

The coaxial cables from all five antennas are routed to an Ameritron model RCS-8V remote switch, which is located inside the house, near where the cables enter. A single RG-213 coaxial cable, having a length of 25 feet, runs from the switch to the operating position, and has a worst case loss of about 0.3 dB at 30 MHz, the highest operating frequency for which it is used. The purpose of the switch is to allow rapid selection of antenna type from the operating position without having a large number of rather bulky cables routed all the way to the operating position. Switch manufacturer Ameritron rates loss of their device as "less than 1 dB at 150 MHz"⁵. Since loss is a linear function relative to frequency, the worst case expected loss through the switch at 30 MHz would be approximately 0.2 dB.

The *ARRL Handbook*, a well-respected engineering design guide, has published typical performance specifications for most coaxial cables in typical Amateur Radio use for many years. (Coaxial cable is a type of signal transmission line commonly used to interconnect antennas and associated radio equipment.) The tables for the cable types used in this radio station installation give attenuation (loss) values as follows⁶:

- ❖ Type RG-58/U: approximately 0.47 dB loss per 100 feet at 2 MHz (used only for the 160m Inverted-L antenna)
- ❖ Type RG-213/U: approximately 1.3 dB loss per 100 feet at 30 MHz (just above the 10m Amateur band) and approximately 0.56 dB loss per 100 feet at 7 MHz (low end of the 40m Amateur band)

Since only 32 feet of type RG-58/U is used between the Ameritron switch and the 160m Inverted-L, cable loss in the region of 1.8 to 2 MHz is on the order of 0.16 dB, a negligible value. The 25 feet of RG-213/U between the RCS-8V switch and the station adds perhaps another 0.1 dB. The total losses in this frequency range are negligible.

The 80/40m inverted-V antenna will have a worst case total line loss (including the switch) of about 0.6 to 0.7 dB at 7.3 MHz, the top end of the 40m band.

The 80/40 vertical will have a worst case line loss of about 0.5 dB at 7.3 MHz with its shorter total feed line run.

⁵ Ameritron web site, Model RCS-8V, viewed on May 24, 2004.

⁶ *The 2002 ARRL Handbook for the Radio Amateur*, American Radio Relay League, Newington, CT, pg. 19.6.

The Tri-Band beam and WARC dipole, each of which have total feed line length at or near 100 feet, will have approximately 1.5 dB of cable loss at their respective highest frequency (the region of 29.7 and 24.9 MHz, respectively) bands of operation.

While measurable, the losses discussed above are not significantly high. With total system measurement uncertainty being on the order of ± 2 dB⁷, and since all signals intercepted by the antennas at any given frequency will be attenuated equally, the relationship between all antenna-coupled signals and atmospheric or man-made noise is not affected by these levels of transmission losses. Since the goal of this BPLSC testing was to make measurements at the actual operating position of the station, antenna factors and cable losses are relative only and do not factor into any measurement correlation. All cables and antennas used for data collection were the same for all tests.

The following figures show the actual antennas as they exist and as used for measurement purposes:



Figure 3-8: General view of antennas: (top to bottom) WARC band dipole; TH7-DXX Tri-Bander; side arm support for Inverted-V; top of ground-mounted vertical is in foreground.

⁷ Measurement uncertainty for the equipment used in this testing is described in the Test Approach section of this paper.

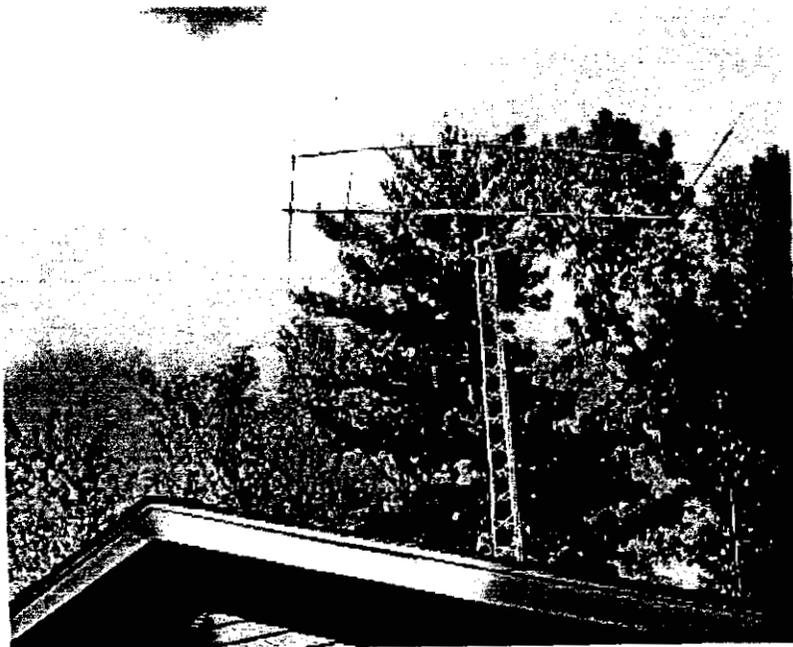


Figure 3-9: The 160m Inverted-L antenna is a horizontal wire visible to the left of the tower, above the roof peak.

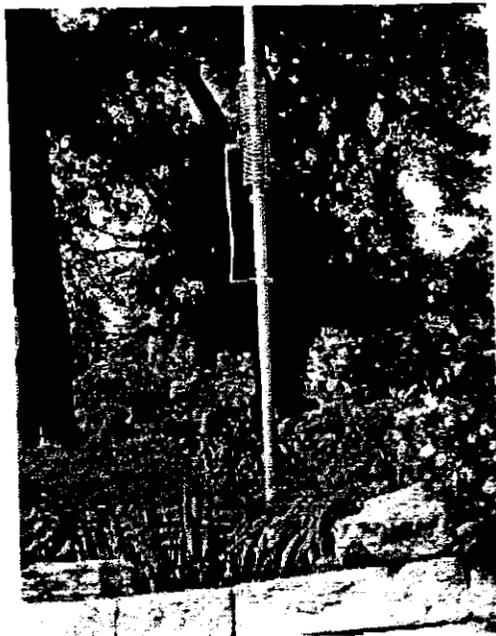


Figure 3-10: Base of Vertical

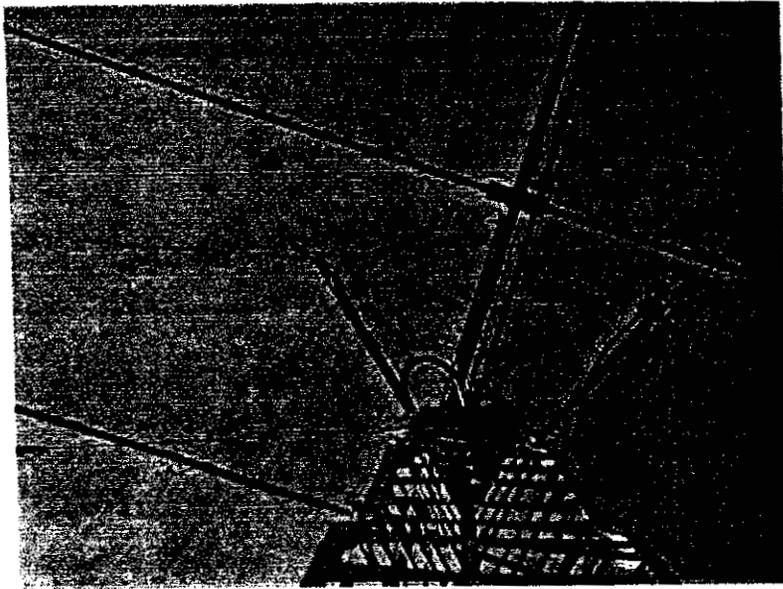


Figure 3-11: Sidearm mount for 80-40 meter Inverted-V

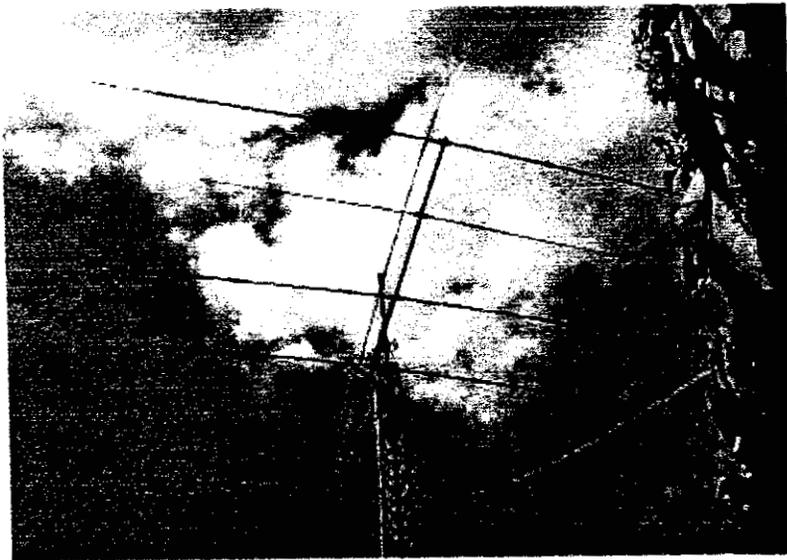


Figure 3-12: Tri-Band Beam and WARC Dipole, and one side of the 40m Inverted-V

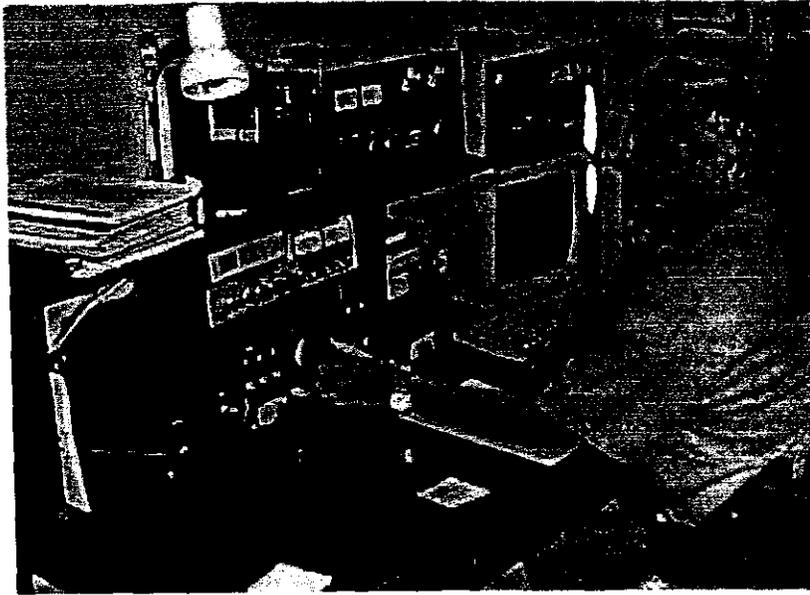


Fig 3-13: Mr. James Spencer at the operating position of Amateur Radio Station W0SR.

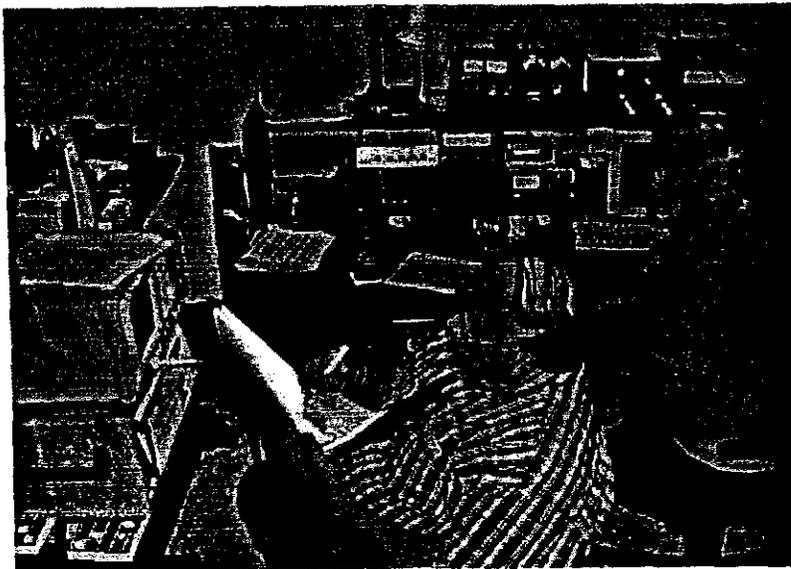


Fig. 3-14: Mr. Dale Svetanoff takes notes as Mr. Spencer looks on. The Agilent E4411B spectrum analyzer is sitting atop the Wandel & Goltermann SPM-17 Level Meter. Either instrument may be connected to the regular radio station coaxial cable as required. (The coaxial cable is the black cable shown connected to the input connector of the Agilent E4411B in the above photo.)

4. TEST APPROACH

The Cedar Rapids BPL Steering Committee asked Mr. Dale Svetanoff, WA9ENA, to perform the on-site testing at Mr. Spencer's station location. A spectrum analyzer was set up in the WØSR radio operations room of Mr. Spencer on three (3) different dates: April 8th, May 10th, and May 19th, all in 2004. The spectrum analyzers used were Agilent Technologies Model E4411B, serial numbers MY41441567 (calibration due 09/30/2004) and MY41441574 (calibration due 09/30/2004). Analyzer serial number MY41441567 was used on April 8th and May 10th, while analyzer serial number MY41441574 was used on May 19th.

Both spectrum analyzers have the following main characteristics⁸:

Table 4-1: Spectrum Analyzer Characteristics

| Characteristic | Specification |
|---|---|
| Frequency range | 9 kHz to 1.5 GHz |
| Amplitude accuracy | As noted below: |
| At reference setting ⁹ | ± 0.4 dB |
| Overall amplitude accuracy, 20 to 30 °C | ± (0.6 dB + absolute frequency response) |
| Input attenuator uncertainty at 50 MHz | 10 dB is reference; 20 to 60 dB attenuation is ± (0.1 dB + .01 x attenuator setting) |
| Frequency Response | |
| ➤ 10 dB attenuation, 20 to 30 °C | ± 0.5 dB |
| ➤ 0, 5, 15 to 60 dB attenuation | ± 1.0 dB, characteristic |

Both spectrum analyzers were previously calibrated with standards traceable to the National Institute of Standards and Technology, and calibration certificates are on file.

Neither spectrum analyzer was used at the reference setting⁹; thus, the average measurement uncertainty for amplitude error factors is the sum of the worst case attenuation setting and its uncertainty with respect to frequency response. This would be a value ranging from ± 1.6 dB (the 10dB attenuator was used for some

⁸ Agilent ESA-L series Spectrum Analyzers Specifications Guide, Agilent Technologies, Part number E4403-90032, August, 2002, pp. 78-79.

⁹ Settings are: reference level -25 dBm; input attenuation 10 dB, center frequency 50 MHz; Res BW 1 kHz, Video filter 1 kHz; amplitude scale linear or log; span 2 kHz; sweep time coupled; signal at reference level.

measurements) to as much as ± 2.0 dB, using the above information and 30 dB of attenuation. Tests were conducted with the equipment being in a temperature environment of 20 to 30 °C. Test data was recorded onto floppy discs via a built-in floppy drive on each analyzer. The data was saved as a .csv file which was later converted to an Excel spreadsheet. All spreadsheets contain the serial number identification of the spectrum analyzer used and relevant scan parameters. All plots were run using Excel.

Other equipment used during the tests, but not for purposes of recording data:

- Wandel & Goltermann Model SPM-17 Level Meter, range 10 kHz to 110 MHz - used to audibly monitor the various BPL carrier signals and obtain sound files of those signals
- Icom IC-765 Transceiver, 1.8 MHz through 30 MHz (owned by Mr. Spencer) – Used to obtain sound files of BPL signals and for comparison of signal strength at time of test relative to other times (using the relative reading “S” meter). This is the primary radio at station WØSR.
- Sony Hi8 Video Camera – used to record video with sound during various tests
- Nikon Coolpix® 775 Digital Camera – used to record still photographs of the equipment installations (BPL and at Amateur station WØSR), the surrounding neighborhood environment, and brief digital movies of spectrum analyzer sequences showing BPL signal activity.

The purpose of the additional equipment listed was to substantiate and confirm the presence (or absence) of BPL and other interfering signals when collecting the test data. Since BPL signals are, by nature, changing at various intervals, capturing the changes and the related effects upon a communication system is difficult when recording plots at specific points in time. The BPL signal changes manifest themselves both audibly and visually, and the video camera was used to capture samples of activity. Unfortunately, the actual captured video and sounds can not be included in this report. It is anticipated that portions of the audio and video clips, as well as numerous digital images, will be available from the Cedar Rapids BPL Steering Committee as a support exhibit to this test report.

Mr. Spencer has multiple computers and a Local Area Network (“LAN”) within his home. All computers and the LAN were shut down during all tests to ensure that they did not contribute to the measured signal levels. All of the radio equipment in the radio operations room was turned off, with the exception of the control box for the Ameritron RCS-8V remote switch. This control box contains only a rotary switch, a few resistors, and LED indicators. There are no digital circuits, and power is provided by the manufacturer’s linear (non-switching) wall type power supply. Power must be applied continuously to the relay that switches the selected antenna onto the shack feed line. The rotator control box was used to orient the Tri-Band Beam and WARC Dipole for maximum signal indication. This controller is in the “Off” state until and unless it is commanded to rotate the antenna mast.

No data was taken during antenna rotation; maximum signal was visually determined from either the spectrum analyzer display or S-meter reading of the IC-765 station transceiver.

One of the key issues in recording the data was consideration in selection of the spectrum analyzer filter bandwidth(s) to be used. Most of the test data was collected using a resolution bandwidth of 3 kHz, with the follow-on video filter bandwidth set to either the same, or greater, bandwidth. (The video filter in a spectrum analyzer has the effect of smoothing the trace by reduction of noise and, when a narrow bandwidth has been selected, lowers the noise floor of the spectrum analyzer receiver.) The selection of 3 kHz was driven by the fact that typical communications receivers use intermediate frequency ("IF") filter bandwidths in the range of approximately 2.1 kHz to 2.8 kHz for single sideband ("SSB") operation; since the use of regular, typical, Amateur Radio antennas to make these measurements was *the* point in this work, it was felt that the spectrum analyzer should replicate the characteristics of the station receiver as well. Communications using Morse code continuous wave ("CW") and certain digital modes can, and do, use narrower bandwidths. The result of using filters that are closely matched to the bandwidth of the transmitted signal is to reduce the extraneous noise presented to the radio operator (or decoding system, in the case of digital signals), resulting in an optimized signal to noise ratio for the given mode.

Some data was taken using spectrum analyzer bandwidths less than 3 kHz. This action resulted in better visibility of the typical BPL waveform, which has Orthogonal Frequency Domain Multiplexing ("OFDM") modulated carriers at about 1.1 kHz intervals across the spectrum of operation. An IF filter having 3 kHz bandwidth tends to integrate 3 such carriers into a single waveform profile, making it difficult to ascertain by visual inspection of plots that BPL signals are indeed being viewed. The differences in the filter action can be readily seen in some of the data plots in Appendix 1.

The test plan decided upon was as follows:

- For the April 8th tests, made about one week after trial BPL operations began near Mr. Spencer's station, spectrum analyzer scans were made using all five (5) of the available antennas. Each antenna was used in ranges near and within its rated operating frequency range. The total spectrum surveyed was 1 MHz through 33 MHz. BPL was operational during all of these scans.
- The plan for May 10th had been to obtain baseline scans, identical in frequency span to those taken on April 8th, so that a comparison could be made between BPL on and BPL off conditions. Alliant Energy had agreed to switch off the BPL signals for two hours at Mr. Spencer's request. Several minutes after Mr. Spencer contacted Alliant, a decrease in the BPL spectrum was noticed, but not a complete elimination of the signals¹⁰.

¹⁰ It was subsequently learned that Alliant Energy had, indeed, commanded the BPL units to terminate operations. However, the units operate in "daisy chain" fashion: the operational commands are sent to the

No data plots were taken, but video recordings with sound were made prior to the requested shutdown. Interference was still present even with the reduced spectrum of signals. Visual comparisons were made between plotted graphs of the April 8th scans and the signals present before shutdown in an effort to confirm that signal conditions on this day were similar to those experienced on the earlier date.

- Alliant Energy agreed to a second attempt at shutting down the trial system for two hours. This attempt was successful on May 19th. A few test scans were run with the spectrum analyzer prior to shutdown to confirm similarity to the April 8th signal conditions. Once shutdown was confirmed, scans were made to plot the ambient noise conditions on all of the Amateur bands between 1 and 33 MHz. (It should be noted that Mr. Spencer had filed several previous complaints with Alliant Energy regarding excessive power line noise at his location. That noise was still present, having been made less evident by the BPL signals for the previous several weeks.) New scans were run using averaging techniques to mitigate some of the effects of the power line noise upon the baseline. When BPL signals re-appeared two hours after shutdown, it was noticed that they did not have the same spectral distribution as prior to shutdown. Detailed, limited range scans were run on the 17m and 15m Amateur bands, as these were the areas of greatest signal strength after the system returned to operation.

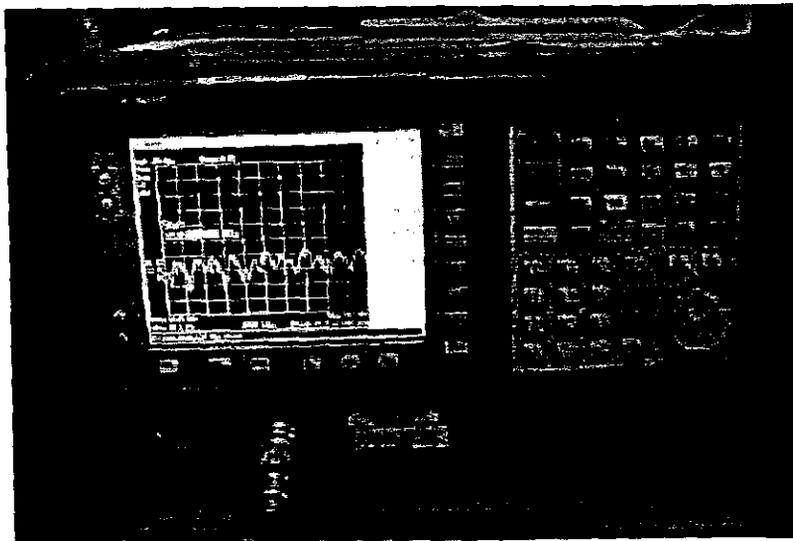


Fig. 4-1

Agilent E4411B Spectrum Analyzer with spectrum plot showing BPL signals between 18.05 and 18.10 MHz. The floppy disc drive for recording data is visible at the right edge of the photo.

unit nearest the power substation on Glass Road. That unit sends commands downstream to the other units via the power line system. In this case, it appeared that the first and second units switched off, but not the third and fourth units. It is believed that this effect may have been due to reduced injection levels within the BPL units, as told to Mr. Spencer by Alliant Energy representatives.

5. TEST DESCRIPTION

The Tri-Band Beam and WARC Dipole antennas can be rotated in azimuth a full 360 degrees. For purposes of these tests, these antennas were rotated to a position which maximized interfering signals. The heading which produced that condition was westward, toward the distribution power lines upon which the BPL circuit is implemented.

Data was taken at multiple frequency ranges between 1.0 MHz and 33 MHz. Each frequency range was chosen to match with the associated antenna operating range. The BPL signal was impulsive (varying amplitude), with the carriers distinctive and audibly distinguishable from 60 Hz power line noise with any of the receivers. The individual carriers could be shown by careful selection of spectrum analyzer IF bandwidth, and could be heard with either the W&G SPM-17 or the Icom IC-765. However, the required spectrum analyzer bandwidth for "imaging" carriers was narrower than the bandwidth used for routine voice communications.

Tests on April 8th and May 10th were run at about the same time of day: starting at approximately 4:30 pm CDT and ending at approximately 6:00 pm CDT. The tests on May 19th began at about 4:30 pm, and shut down of the BPL signal occurred at 4:50 pm for a period of two (2) hours. Test data was taken with BPL off until approximately 6:15 pm, and more data was taken when BPL returned because it appeared that the spectral characteristics of the system were different after it reactivated.

The BPL Steering Committee is grateful to Alliant Energy for their cooperation as indicated by their willingness to temporarily turn off the BPL system for our tests.

6. CONCLUSIONS

The presence of, or lack of, BPL signals is readily detectable on any of the sweep plots which have signal/no signal plots. BPL signals are readily apparent over the levels of natural noise, which increase at lower frequencies. This is borne out by review of any of the sweep plots which cover a large portion of the HF spectrum.

A reference line to show where a 1 microvolt signal (in a 50 ohm system) lies has been added at -107 dBm. This is representative of the sensitivity exhibited by typical narrow band communications equipment, such as Mr. Spencer's receiver, as well as those on the general market, past and present (see Table A2-1 in Appendix 2). It can readily be seen that, for the most part, BPL signals intercepted by the antennas at station WØSR are well above the sensitivity levels of these receivers.

The notching of BPL to minimize interference to Amateur Radio communications is evident in some plots, but even at the given separation distance from the active BPL lines and associated hardware, these levels are still too high to avoid

harmful interference. In some cases, it was noted that the notches had not been located in proper relation to the Amateur Radio band.

The photographs of the spectrum analyzer traces (Part B of Appendix 1) do show the transitory nature of the OFDM carrier signals, which result in changing audio tones when heard with an SSB receiver. Reception of desired signals through these audio tones, when they are nearly as strong, or stronger, than the desired signals is not possible. Practical receiver filtering and audio processing are not able to adequately distinguish between desired signals and these injected tones. Further, an additional BPL signal reduction of 20 dB would be needed just to maintain the present high signal levels if Mr. Spencer's station were located at one-tenth its present distance from the BPL signal source.

An inspection of the installed trial BPL system shows that the vendor and Alliant Energy have made a very poor choice in signal transmission: the BPL tones are being sent using but one wire from station to station. The effect, contrary to non-factual comments filed with the FCC by some vendors, is to create antennas that will radiate along their length. Depending upon frequency and length of the actual power line segment, a "long wire effect" may, in fact, produce some degree of directional signal gain, resulting in enhanced interfering emissions (at some frequencies) from the ends of each unbalanced segment¹¹.

The BPL Steering Committee concludes that BPL systems of the type tested are not practical in the MF and HF regions, especially where they are co-located in near proximity to licensed users of the spectrum.

7. TEST PERSONNEL

The test work was done by a team consisting of Cedar Rapids BPL Steering Committee members. The Test Team consisted of:

- o **Mr. James Spencer, WØSR, Test Site Host**
- o **Mr. Roderick Blocksome, KØDAS**
- o **Mr. Alan Erickson, WBØOAV**
- o **Mr. Dale Svetanoff, WA9ENA, Test Leader**

¹¹ Although this test did not obtain data from multiple geographic locations to directly support this statement, it is a well-known characteristic of long wire antennas. Ref: *Radio Handbook*, 22nd Edition, William I. Orr, Howard W. Sams & Co., 1981, pp. 28.2 to 28.3.

8. ABOUT THE CEDAR RAPIDS BPL STEERING COMMITTEE

BPL Steering Committee Personnel and Mission Statement

Who We Are:

A group of concerned members of the Cedar Rapids area community who are active in the support of public service and emergency communications in the community through the use of Amateur Radio and who are experts in commercial and military communications technologies through their employment.

The members of the Cedar Rapids BPL Steering Committee are:

Mr. Ronald Breitwisch, KCØOX, Chairman

Ron Breitwisch has 29 years experience as a design and systems engineer at a major communications and avionics company. His background includes RF and digital design, including HF and VHF receivers and power amplifiers. He is currently the Chief Engineer for an Inmarsat L-band satellite communications system. He holds a BS degree in Electrical Engineering (Univ. of Wisconsin 1975). He is a licensed Advanced Class Amateur Radio operator, and holds a certificate of the formerly issued FCC First Class Radiotelephone license. He is currently the Amateur Radio Emergency Service ("ARES") District Emergency Coordinator for a 7 county area in Iowa, and is an active volunteer with Linn County (Iowa) Emergency Management Agency.

Mr. Roderick Blocksome, KØDAS

Rod Blocksome holds Amateur Radio Extra Class License, KØDAS, and has been continuously licensed and active in Amateur Radio for the past 44 years. He operates all amateur bands from 1.8 MHz thru 2304 MHz, and is active with ARES. He holds a certificate of the formerly issued FCC First Class Radiotelephone license. He holds BSEE, 1968, and MSEE, 1974, degrees. His professional experience includes 4 years in US Air Force as a Communications Engineering Officer and 37 years as an HF equipment designer, engineering manager, and communications systems engineer with a major aerospace company. He has authored numerous technical papers and magazine articles dealing with HF through microwave topics, and holds one U.S. patent.

Mr. Alan Erickson, WBØOAV

Alan Erickson works for a major aerospace company in military communications, where he has been employed in RF power amplifier design and systems engineering for 30 years. His project experience extends from HF through UHF and L-band frequencies, transmitter power levels up to 50 kW, and includes both narrow and broadband modulation types including OFDM. He holds a BA, and a BSEE in Electrical Engineering (University of Illinois, 1974) and holds four patents directly related to RF design. Alan is a licensed Extra Class amateur radio operator with call sign WBØOAV, and was first licensed in 1969. He holds a certificate of the formerly issued FCC First Class Radiotelephone license, and is active with ARES.

Mr. Alvin Groff, KØVM

Alvin Groff is retired after 37 years working for a major communications and avionics company. He held technical and engineering positions in micro-electronics design. He holds an Associate in Electronics Technology degree (Iowa State University, 1963). He is an Extra Class amateur radio operator, call KØVM, first licensed in 1959, and active

ever since, including ARES. He holds a certificate of the formerly issued FCC First Class Radiotelephone License.

Mr. H. Thomas Hauer, KØYA

H. Thomas (Tom) Hauer is Director, Strategic Business Development for a major communications company in Cedar Rapids, Iowa. Prior to that, Tom was a Program Manager for both SATCOM and HF programs. Tom has over 30 years experience in communications from HF to Ka Band. He has participated in design, testing and manufacturing of numerous satellites including the first high power broadcast satellites, DSCS III, GPS, Spacenet, G-Star, Americom and numerous others. Tom holds a BSEE from Drexel University and MBA from Nova Southeastern University.

Tom has been an active Amateur Radio operator for over 43 years and holds an Extra Class license, call sign KØYA. He is an active participant in ARES and is vice president of the Eastern Iowa DX Association.

Mr. James Spencer, WØSR

James Spencer is a retired engineering executive with 39 years experience at a major electronics firm. He was involved in the design and management of communications and aviation electronics systems for both commercial and military customers. He holds a BSEE/MSEE from the University of Wyoming and is an Extra Class Amateur licensee with the call sign WØSR, first licensed in 1953. He also holds a certificate of the formerly issued FCC First Class Radiotelephone license. He is a licensed Professional Engineer in the state of Iowa and is active with the ARES.

Mr. Dale Svetanoff, WA9ENA

Dale Svetanoff has worked in telecommunications, medical and industrial imaging, RF shielding, and aerospace communications and avionics systems for more than 35 years. He has been issued 3 patents, is a member of the IEEE and IEEE Standards Association, chair of an IEEE standards working group, and has participated in the updating of military standards which pertain to electromagnetic effects. He served in the US Air Force Reserves (ground radio systems) and is presently employed as a Senior Electromagnetic Compatibility Engineer ("EMC"). Dale has been a Certified N.A.R.T.E. EMC Engineer for more than 12 years. He has been an active Amateur Radio operator since 1962, presently holding the Advanced Class call WA9ENA, and operates on most HF, VHF, and UHF bands. He is a registered Emergency Responder for communications assistance in Jones County, Iowa, and is active with ARES.

Dr. Robert W. Walstrom, WØEJ

Robert W. Walstrom has 30 years of active engineering experience in the U. S. Air Force and with a major communications design and manufacturing company. His broad practical experience spans HF, VHF, and UHF radio, global positioning systems, and satellite communications development and design. He has earned BS (South Dakota State University, 1970), MS and PhD (Iowa State University, 1971, 1979) degrees all in electrical engineering and is a registered Professional Engineer (Iowa and California). He has held a certificate of the formerly issued FCC First Class Radiotelephone license and has been a licensed Amateur Radio operator (Amateur Extra Class) for over 40 years. Dr. Walstrom represents Iowa, Missouri, Kansas, and Nebraska as a Director on the American Radio Relay League ("ARRL") Board of Directors. He is active in ARES.

What We Are Doing:

HF radio has been the basis for communications since the beginning of wireless RF communications. It has been used by government and military personnel, civil defense and emergency services personnel, commercial businesses, shortwave broadcasters, Amateur Radio operators and shortwave listeners for nearly 100 years in times of peace, war, and natural disaster.

This committee is committed to preserving the ability of these services to use the MF and HF radio spectrum in the Cedar Rapids community and throughout the United States.

How We Are Going To Do It:

The committee will support active Amateur Radio HF operators, businesses, and other commercial and government users of HF communications in the Cedar Rapids community to identify harmful interference caused by BPL, make valid interference measurements, contact the party responsible for causing the harmful interference, file required complaints and reports with the interfering party as well as the FCC, and provide necessary technical support to validate their claims.

The committee will work with the local power utilities demonstrating or implementing BPL and the businesses whose technology is being demonstrated or implemented to help them identify harmful interference, locate the specific causes of the harmful interference, and ensure that the harmful interference is eliminated.

The committee will work with the ARRL, The National Association For Amateur Radio, and enlist their assistance to ensure that all efforts by the committee are valid, properly documented, and completed with the utmost attention to honesty and integrity.

The committee will file responses to requests by the ARRL and the FCC for comment on technical issues associated with the regulation of BPL and with identifying, understanding and eliminating harmful interference from BPL systems.

The committee will adhere to the highest moral and ethical standards in all its actions.

APPENDIX 1

PART A: Test Data Plots

These are composite plots made from data taken on April 8th ("BPL ON") and May 19th ("BPL OFF"), unless otherwise noted. The 1 μ V reference line has been inserted at -107 dBm, which is the equivalent level in a 50 ohm impedance. A "Ham Band" reference line shows the frequency limits of applicable Amateur Radio bands within the plots. As Table A-2 demonstrates, a desired signal at this level is more than adequate for producing a usable signal-to-noise ratio in all receivers listed. Unwanted signals at or above this level will produce anything from significant noise to destructive interference that renders copy of the desired communication impossible.

1-3 MHz 160m Inv-L 3kHz Res BW

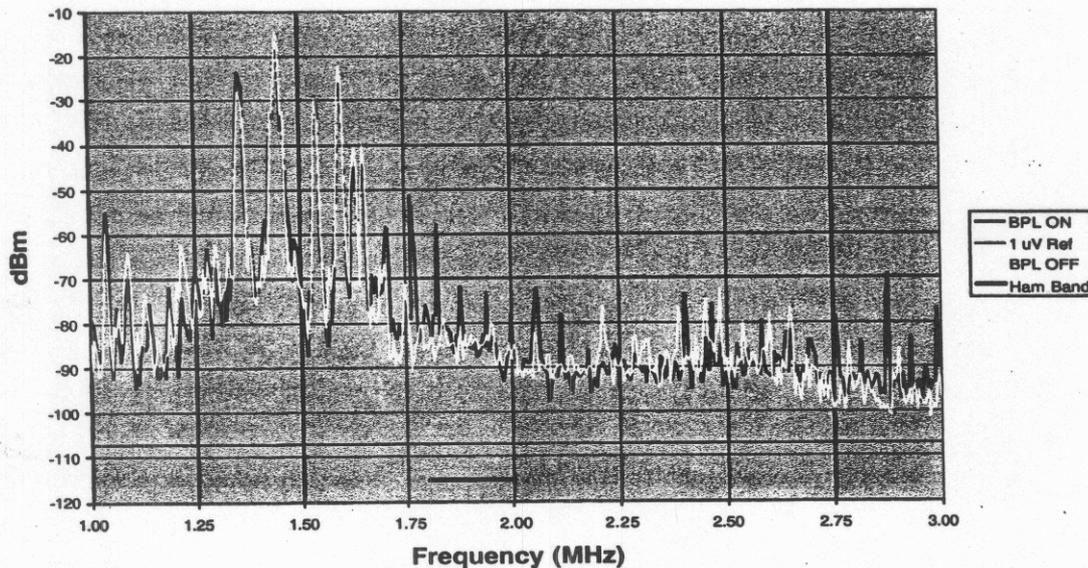


Fig. A1A-1: The spectrum from 1 to 3 MHz as "seen" by the 160m Inverted-L antenna. The Amateur Band of 1.8 to 2.0 MHz is at the center of the plot. The yellow trace shows strong AM broadcast band signals (left side) and various impulse noise s (right side).

2-8MHz Inv-V 3kHz res BW

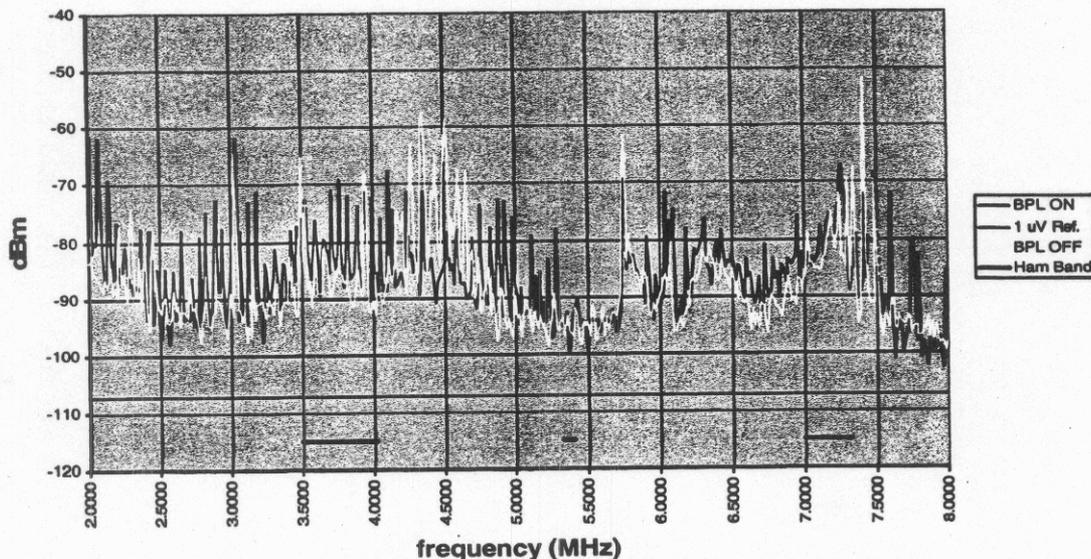


Fig. A1A-2: The spectrum from 2 to 8 MHz as "seen" by the dual band Inverted-V antenna. This view actually encompasses three (3) Amateur bands: 80m (just left of center), 60m (center), and 40m (right end). Note the BPL notching for 80m that isn't quite at the correct frequencies, and for 60m. There does not appear to be an effective notch for 40m at the

time this data was taken. The signal peaks on the yellow trace were audibly identified as typical of noise from power lines due to corona and arcing.

13-33 MHz Tri-Band 3kHz Res BW

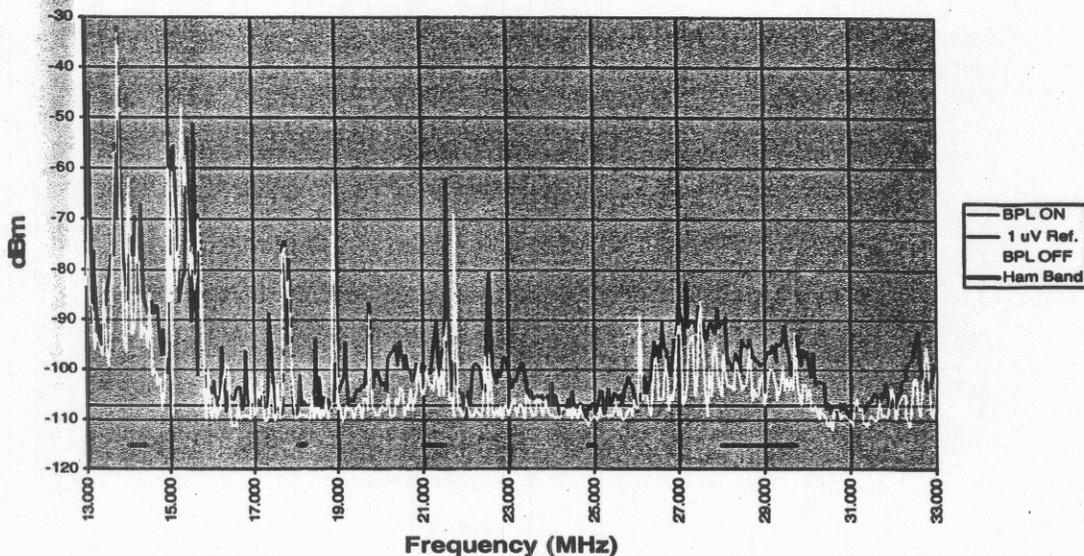


Fig. A1A-3: The spectrum from 13 to 33 MHz as seen by the Tri-Band beam. This range includes five (5) Amateur bands, although the antenna is designed for just three of them. The 20m band is to the left, the 17m band is one-third from left, the 15m band is just left of center, the 12m band is just right of center, and the 10m band is one-third from right. Note the high BPL and noise levels in and near the 20m and 10m bands. Some of the large signal peaks in yellow were audibly identified as short wave broadcast.

27-30MHz Tri-Band 3kHz res BW

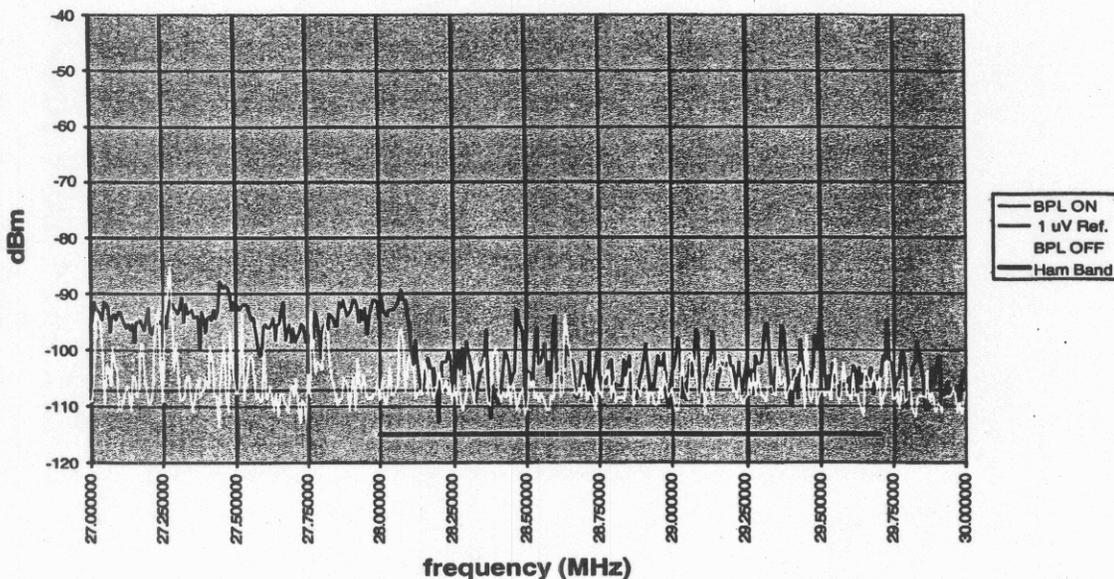


Fig. A1A-4: A close-in view of the 10m band as seen by the Tri-Band beam. The decrease in BPL signal (blue trace) is probably notching. Note that even the reduced level is several dB above the 1 μ V reference line, meaning that these would still be loud signals into the receiver.

The three graphs which comprise Figure A1A-5 are a detailed scan with the relatively narrow spectrum analyzer IF filter of 1 kHz. Keeping the video filter wider (at 3 kHz) meant that the BPL signal "signature" was more readily visible. Because of the resolution obtained with this method,

the plots shown are each the composite result of stringing three consecutive frequency range sweeps together. (Each sweep was only 50 kHz wide.) The data for these graphs was taken on the evening of May 19th after the BPL system re-started, following the 2 hour shut-down.

21.00 to 21.15 MHz 1kHz res BW

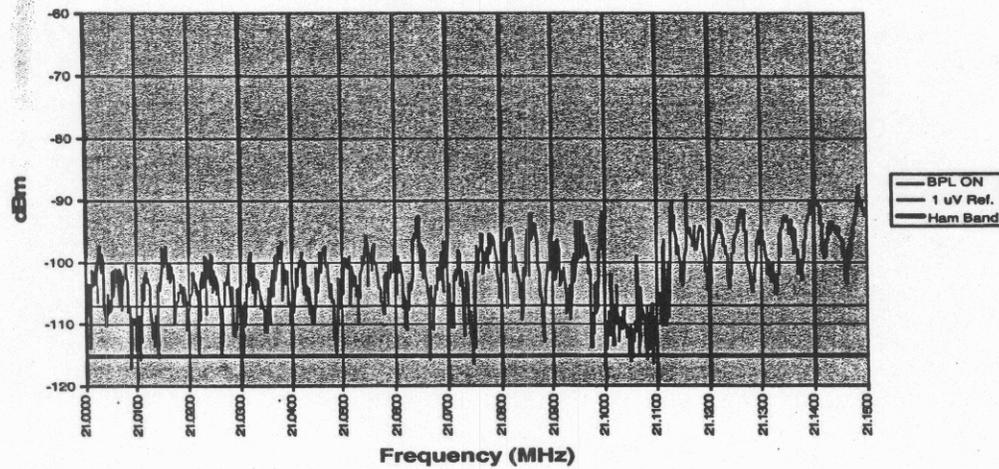


Fig. A1A-5a

21.15 to 21.30 MHz 1kHz res BW

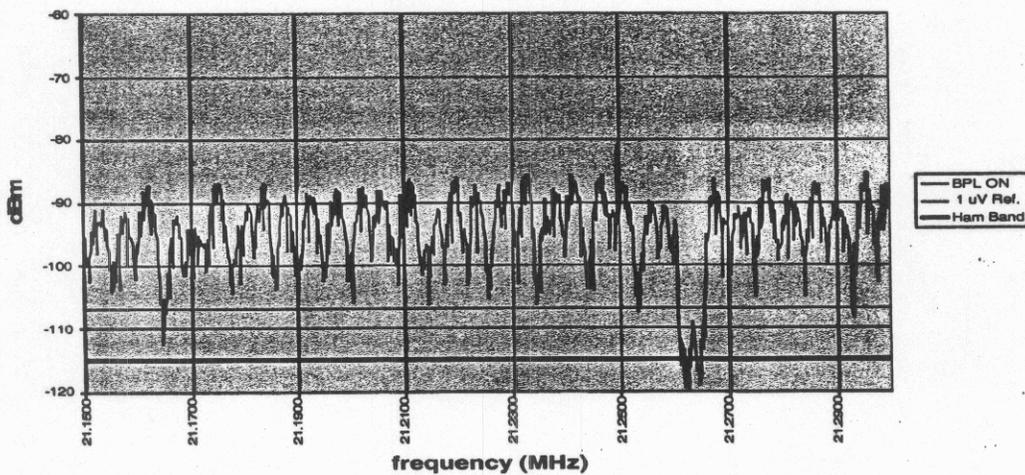


Fig. A1A-5b

21.30 to 21.40 MHz 1kHz res BW

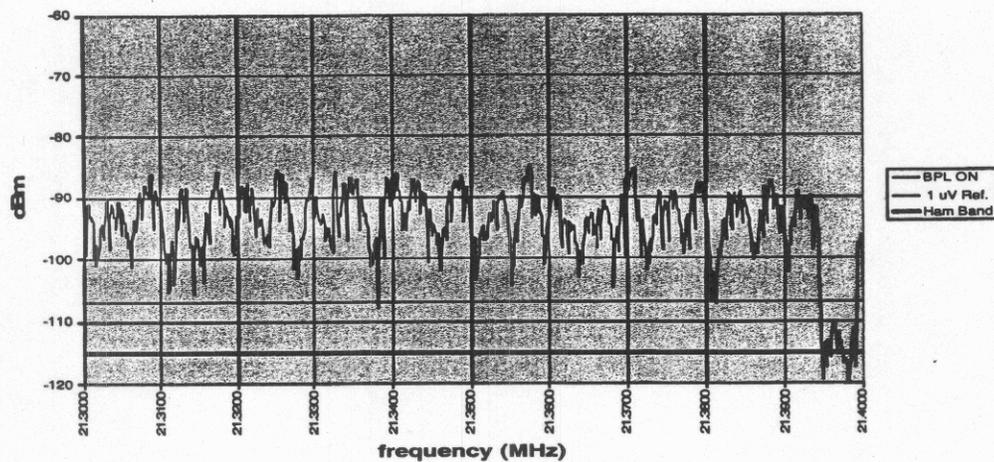


Fig. A1A-5c