

EX PARTE OR LATE FILED

03-104 / 104-37



ARRL The national association for **AMATEUR RADIO**

Public Service

Advocacy

Education

Membership

ORIGINAL

FILED/ACCEPTED
DEC 21 2006
Federal Communications Commission
Office of the Secretary

December 6, 2006

Commissioner Jonathan S. Adelstein
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Via FAX – Page 1 of 4 pages

Dear Commissioner Adelstein:

Here is a letter I have just sent to Chairman Martin protesting his use of inaccurate information supplied by a biased BPL industry source in a recent presentation, and his excessive emphasis on BPL as a “new” broadband technology when other new technologies, according to the Commission’s own reports, are vastly more successful and promising.

The ARRL remains highly dissatisfied with the Commission’s handling of the BPL radio interference issue. There is nothing evenhanded about the Commission’s continuing favoritism of BPL over other broadband technologies that do not share its unique shortcoming of causing radio spectrum pollution.

Sincerely,

David Sumner
Chief Executive Officer

No. of Copies rec'd 0
List ABCDE

- JOEL M. HARRISON
VIZN. PRESIDENT
- KAY C. CRAIGIE
VIZN. FINANCIAL PRESIDENT
- RICK RODERICK
VIZN. VICE PRESIDENT
- RODNEY J. STAFFORD
VIZN. VICE PRESIDENT
- JAMES E. McCOBB
VIZN. TREASURER
- DAVID SUMNER
VIZN. CHIEF EXECUTIVE OFFICER
- BARRY J. SHELLEY
VIZN. CHIEF FINANCIAL OFFICER
- MARY M. HOBART
VIZN. CHIEF DEVELOPMENT OFFICER
- PAUL RINALDO
VIZN. CHIEF TECHNOLOGY OFFICER
- HAROLD KRAMER
VIZN. CHIEF OPERATIONS OFFICER

QST
OFFICIAL JOURNAL

ADMINISTRATIVE
HEADQUARTERS
225 Main Street
Newington, Connecticut
USA 07111-1414

Telephone: 860-594-0200
FAX: 860-594-0202
www.arrl.org



ARRL The national association for **AMATEUR RADIO**

*COPY FOR COMMISSIONER
ADELSTEIN*

December 6, 2006

Kevin J. Martin, Chairman
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Via FAX – Page 1 of 3 pages

Dear Chairman Martin:

In your November 30 presentation to the Georgetown University McDonough School of Business's Center for Business and Public Policy, you included a slide purporting to show "Broadband Over Power Line Deployments." This slide is taken from a biased industry source and fails to note that a large percentage of the deployments shown on the map have been shut down and no longer exist.

Here are but a few examples:

- **PPL** announced in October 2005, more than a year ago, that it was terminating its trial deployment because it had been found to be uneconomic.
- **United Illuminating** announced two trial deployments, but only ever installed one and shut that one down in December 2005 after a few months of operation.
- **SMECO** announced in March 2006 that it had ended its trial in December 2005 and noted that "BPL signal speeds and bandwidth are not competitive with other technologies currently available."
- The **Idaho Power** deployment was by **IDACOMM**, which announced in January 2006 that it was abandoning the BPL business (and has done so).
- **RPU** has no BPL deployed. I confirmed this by telephone yesterday. They had an unsuccessful Main.net trial deployment in 2004.

This list is by no means comprehensive. The fact is that BPL systems are being shut down faster than they are being deployed. The ARRL respectfully requests that the FCC cease using the United Power Line Council as a source for illustrating BPL deployments.

We also request that in the spirit of a level playing-field that you say is a guiding regulatory principle, you consider a more evenhanded approach to the promotion

Public Service

Advocacy

Education

Membership

- JOEL M. HARRISON**
W3JL, PRESIDENT
- KAY C. CRAIGIE**
K0RU, FIRST VICE PRESIDENT
- RICK RODENICK**
K9UR, VICE PRESIDENT
- RODNEY J. STAFFOR**
W5FND, VP. INT. AFF. OF THE INTERNATIONAL ARRL ASS.
- JAMES E. McCOBB**
K1LU, TREASURER
- DAVID SUMNER**
W1CC, CHIEF EXECUTIVE OFFICER, FCC, EMERITUS
- DARRY J. SHELLEY**
W1VZY, CHIEF FINANCIAL OFFICER
- MARY M. HOBART**
K1MTH, CHIEF DEVELOPMENT
- PAUL RINALDO**
W1NB, CHIEF TECHNOLOGY OFFICER
- HAROLD KRAMER**
W1LS, CHIEF OPERATING OFFICER



ADMINISTRATIVE HEADQUARTERS
225 MARY STREET
WASHINGTON, CONNECTICUT
USA 06111-1494

Telephone: 860-694-0000
FAX: 860-694-0000
www.arrl.org

Kevin J. Martin, Chairman, FCC

Page 2

December 6, 2006

of so-called nascent broadband technologies. For example, your prepared remarks cited "wireless broadband, broadband over powerline, and Fiber-to-the-Home" all as "new technologies that are beginning to be deployed," yet neither wireless broadband nor Fiber-to-the-Home merited a PowerPoint slide – despite the fact that the FCC Report, *High-Speed Services for Internet Access: Status as of December 31, 2005* showed 448,196 Fiber lines and 256,538 Fixed Wireless "lines" compared to just 5,859 for "Power Line and Other." Your prepared remarks do not even mention satellite broadband, yet the same report shows 426,928 satellite "lines."

As you know, the ARRL's concern is with the still-unresolved radio interference issues that uniquely plague BPL and not with BPL as such. However, it is evident that the technology does not deserve the favored treatment the FCC continues to bestow upon it, especially when its inherent shortcoming, that it is a radio spectrum polluter, escapes mention.

Sincerely,



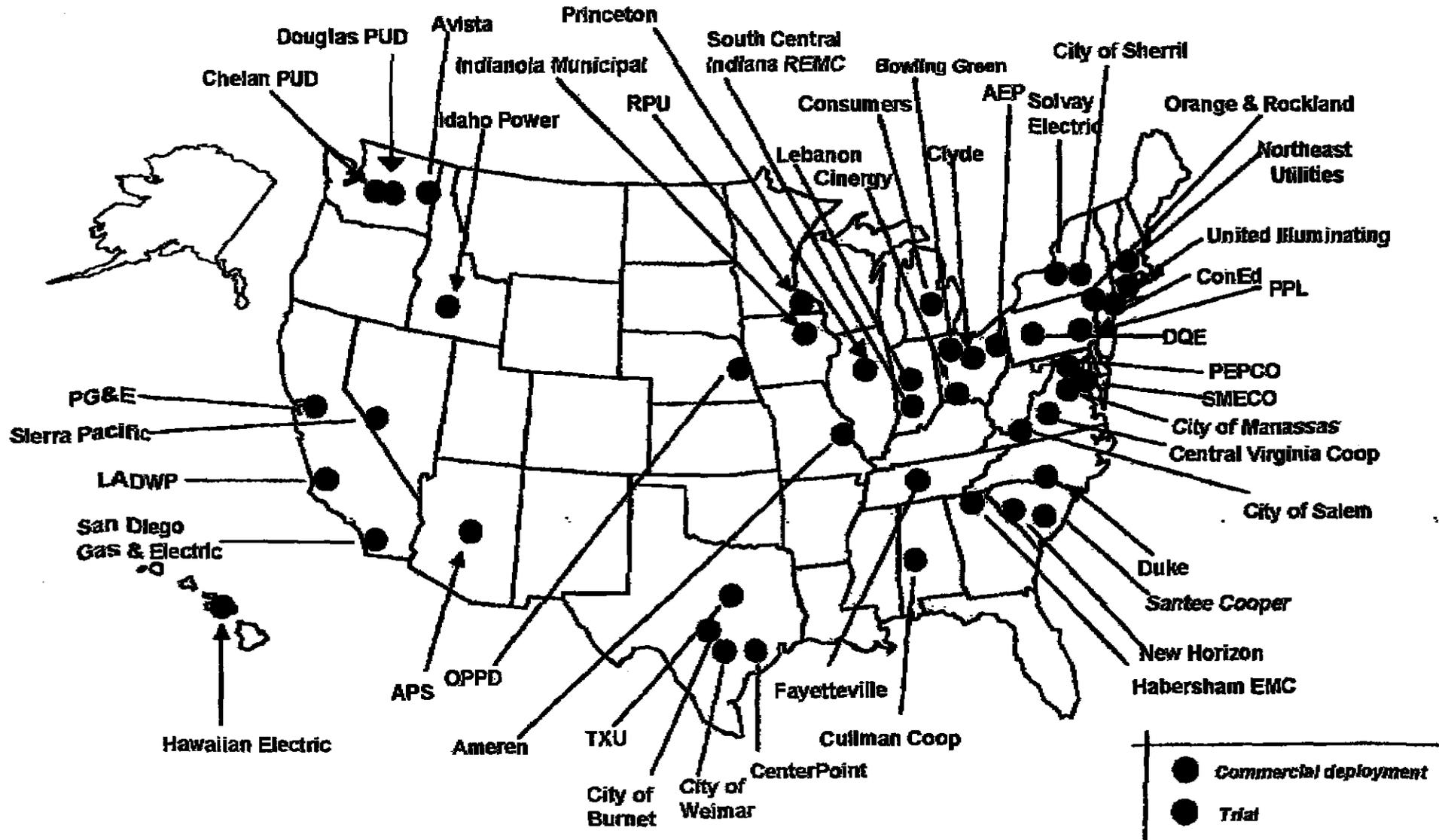
David Sumner
Chief Executive Officer

Attachment: "Broadband Over Powerline Deployments" slide

cc: Commissioners



Broadband Over Powerline Deployments



Source: United Power Line Council, http://www.uplc.etc.org/file_depot/0-10000000/0-10000/7966/conman/BPL+Map+12_12.pdf