

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the matter of

Amendment of parts 1, 2, 15, 74, 87, 90 and)

97 of the Commission's Rules regarding)

implementation of the Final Acts of the World) ET Docket 12-338

Radiocommunication Conference (Geneva,)

2007) (WRC-97), other Allocation issues, and)

related Rule updates.

Reply comments by Hugh P. Bunn, PE regarding the 135.7 – 137.8 kHz Amateur

Radio allocation, in response to comments by the power industry.

The undersigned respectfully requests consideration of these reply comments in response

to filings of the electric power industry, including Mr. Perry Ballenger's comments.

I have spent over 40 years working as an electrical power consultant and as a one time employee of Duke Energy Company. I am in firm agreement with Mr. Perry D. Ballenger's comment regarding PLC systems.

1. These PLC and SCADA system run at power levels which allow them operating in the high noise levels of high voltage transmission lines. These noise levels are likely several orders of magnitude greater than any amateur signal levels would be.
2. The PLC and SCADA systems are outdated and most critical control is done with fiber optics and microwave relay systems.
3. The current Part 15 SCADA and PLC systems use more frequency bandwidth than is required.
4. Retuning any system that falls with the proposed Amateur band of 135.7 – 137.8 KHz could be accomplished at low cost. I have not seen any data showing an excessive number of PLCs that actually operate in this narrow bandwidth.
5. The type of amateur transmissions that are likely to occur in the proposed band are extremely narrow (CW and digital modes) and are unlikely to cause any interference to the PLC systems

which are essentially closed systems with hardwire transmission lines and no “over the air” links.

6. Giving up a very narrow piece of the spectrum (135.7-137.8 KHz) for experimenting and increasing Low Frequency propagation knowledge is an almost negligent concession for the PLC and SCADA operators.

I hereby urge the FCC to allow Amateur Radio operation within the band of 135.7 and 137.8 kHz, subject to reasonable rules for transition.

Respectfully submitted,

Hugh P. Bunn, PE
President
Matrix Engineering, Inc.

Amateur Operator N4LTA
Part 5 Experimental licensee
WG2XCT
WG2XLP