Central Division News & Views

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BPL Proposal Enters Second Phase

FCC Posts NPRM On BPL

After reading the FCC's <u>Notice Of Inquiry</u> on Carrier Current Systems including Broadband over Power Lines (ET Docket 03-104) filed last April, I was convinced the Commission was going to approve rules governing the operation of what is now referred to as BPL. What I did not expect was the commissioners' almost total disregard of hundreds of well-reasoned scientific and economic arguments against their proposal and their rush to put these rules into place. This NOI drew over 5000 comment filings. The FCC could not even wait for the National Telecommunications & Information Administration's (NTIA) study of potential interference problems, which should be completed within the next month or so, before it issued its <u>Notice of Proposed Rule Making</u> on Carrier Current Systems including Broadband over Power Lines (ET Docket 03-104) and Amendment of Part 15 regarding new requirements and measurement guidelines for Access Broadband over Power Line Systems (ET Docket 04-37) on February 23, 2004. Thus ends what can be called <u>Phase One</u> of the struggle to keep a usable HF spectrum for licensed users.

Phase Two of this struggle is, of course, the *Comment* and *Reply Comment* filing periods for this NPRM. This time period is 45 days from the date the NPRM is published in the *Federal Register* for comments, and 75 days for reply comments. At the time of writing this newsletter, this NPRM had not yet been published in the register. However, comments may now be filed and the filing format and procedures are exactly the same as it was for last year's NOI on this proposal.

Space does not permit presenting detailed, documented, reasons supporting the prohibition of BPL. There is lots of this material on the ARRL web site at: http://www.arrl.org/tis/info/html/plc/

However, the major reasons for prohibiting BPL are:

- 1. BPL will interfere with most licensed users of the affected RF spectrum. How much and where depends on several variables, but there will be interference.
- 2. BPL will interfere with itself. Different RF signals propagating on parallel unshielded power lines will cross modulate each other and disrupt data integrity.
- 3. Licensed users of the affected RF spectrum will interfere with BPL signals. Unshielded power lines receive as well as transmit RF signals.
- 4. BPL will not be cheaper than other high-speed broadband transmission systems. BPL RF signals must be re-injected onto the power line about every 7000 ft. in order to compensate for attenuation. This will require constructing a coaxial cable distribution system very similar to a cable TV network. Therefore, there is no cost advantage and BPL will not be offered in rural areas at below market rates.
- 5. The RF interference BPL will generate will make it difficult, if not impossible in many areas, for government agencies (police, fire, emergency services, etc.), the military, and the Broadcast and

Amateur Radio Services to provide vital services. *Homeland Defense* will be crippled, not improved as claimed in the FCC's NPRM.

Don't expect the FCC to have a change of heart about Broadband over Power Lines at this stage of the process. However, your comments on the commission's NPRM are needed to document growing concern and opposition. Your comments will help prepare the ground for the <u>third phase</u> of this struggle: a campaign to get our federal representatives to overrule the FCC. Congress has recently overruled the FCC on a different issue and it's possible it will do so again when all the problems and short-comings are documented and tens of thousands of voters ask their federal representatives to stop BPL.

You can read and download the FCC's NPRM on BPL in Microsoft Word format at: http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-04-29A1.doc

You can read and download the FCC's NPRM on BPL in Adobe Acrobat (PDF) format at: http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-04-29A1.pdf

You can file detailed *Comments* via the FCC's Electronic Comment Filing System (ECFS) at: http://www.fcc.gov/cgb/ecfs/

And can file brief *Comments* on the ECFS Express page at: http://gullfoss2.fcc.gov/ecfs/Upload/

<u>Phase Three</u> will require a massive *Grass Roots Initiative* (GRI) to get tens of thousands of hams and others who support and value the Amateur Radio Service to contact their federal representatives. You can, of course, do this anytime. But I believe it would be far more effective if this GRI is coordinated as to <u>what</u> is to be said, <u>how</u> its to be said, and <u>when</u> it is to be said. ARRL staff and officers are already working on an information package that can be used as guidance in this effort. I expect this package will be available within the next thirty days or so.

In the meantime, get your *Comments* on the FCC's NPRM filed as soon as you can... and also get your ham friends and local government agencies who use amateur radio operators in their operations to file comments.

License Restructuring

After several months in the making, the ARRL board approved a proposal to make further changes to the Amateur Radio Service license system. As of the writing of this newsletter, the FCC has not yet posted this proposal for comments. It's expected the league's proposal and the other similar petitions will be combined into one FCC proceeding sometime this spring.

I have received many email messages on issues related to or directly addressing the ARRL proposal since the World Radio Conference (WRC-03) agreed to eliminate Morse code as a licensing requirement last July. These messages have been split roughly 50-50 on two hot button issues: Morse code requirements and the proposed granting of additional operating privileges to people by merging their license into a higher class license.

There are several goals in the current ARRL license restructuring proposal:

1. Bring more people into amateur radio and have them active on the bands. The proposed new Novice license has a much more attractive set of entry level operating privileges. This coupled with an organized nation-wide mentor program should increase the number of hams actually using their

licenses.

- 2. Simplify the license structure. Reducing the number of licenses would eliminate the shrinking legacy license classes and reduce FCC costs. The commission probably prefers only two, but the ARRL believes three provides a stronger attraction to new people and a better incentive for advancement.
 - Due to the way our current license structure is organized, reducing the number of licenses would result in either loss of privileges for some existing licensees or the granting of privileges to some. The last incentive licensing attempt removed privileges and it was a <u>very</u> serious mistake. The ARRL is not about to repeat this mistake. Therefore, operating privileges would be given to some who have not "earned them" in the eyes of some current licensees.
- 3. Preserve a Morse code requirement in the license structure. Now that the international Morse code requirement has been eliminated, the FCC is free to eliminate it in our license structure. The ARRL board believes the argument it has made for keeping a Morse code requirement for the Extra Class license is a good one and the commission might agree to this. Increasing or keeping the present code requirement is a non-starter with the FCC.

This proposal is based on the results of two professional *Readex* surveys that were taken from a cross-section of ARRL and non-ARRL members. The second one was taken late last summer after WRC-03. There is no way all the aspects of this proposal are going to make everybody happy. However, I believe it will satisfy the greatest majority as it is now written and has a pretty good chance of being approved by the FCC without a lot of changes. When the ARRL proposal is posted for *Comments* by the FCC, I urge you to support it.

Radio Club Newsletters

I receive and read several amateur radio club newsletters every month or quarter, depending on the organization's meeting schedule. About half of them are sent via the Internet as either an email attached file - usually in PDF format, or as a URL (web site address) where I can read and/or download the file. I would like to receive every Central Division radio club's newsletter; preferably in electronic format as this cuts down on the paper pile here and eliminates the club's postage and printing cost. Many of you belong to one or more local clubs. Please ask your leaders to send the club's newsletter to the Central Division Director and Vice Director.

I'm considering establishing a gallery of really good club newsletters on the Central Division web site. Both content and format will be my considerations for posting. This would give clubs another means of getting out their message and exchanging ideas across a wider area at no additional cost. Once the incoming newsletter volume justifies the additional work, I would expect to post 4 to 8 newsletters every month.

The preferred email attached file format is *Adobe Acrobat* (PDF). But *Microsoft Word* and *WordPerfect* file formats can be used as long as potential loss of graphics is acceptable. Or simply email me your web site address - every month - where the file can be read or downloaded. I will not carry over web site addresses from month to month as both they and email addresses change quite often. So get those newsletters coming in, and we will all see what develops...

Hamfest Visits & Meetings

Here is my confirmed ARRL travel schedule for the next three months. It is subject to change if required

ARRL meeting dates are changed.

Mar 12-14	ARRL Executive Com. Meeting Ft. Worth, TX	
Mar 28	North Shore RC Hamfest	Grays Lake, IL
Apr 2-3	AES Superfest	Milwaukee, WI
May 13-16	Dayton Hamvention	Dayton, OH

I hope to see many of you at these hamfests. In addition to shopping for new and used equipment, they are a great way to renew and develop friendships and to meet some of the voices you have heard on your radios.

73 - George R. (Dick) Isely, W9GIG Central Division Director