

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

In the Matter of	)	
	)	
Amendment of Parts 2, 15, 80, 90, 97, and 101 of the	)	
Commission's Rules Regarding Implementation of	)	ET Docket No. 15-99
the Final Acts of the World Radiocommunication	)	
Conference (Geneva, 2012)(WRC-12), Other	)	
Allocation Issues, and Related Rule Updates	)	

**To: The Commission**

**REPLY OF JOHN H. DAVIS TO UTILITIES TELECOM COUNCIL COMMENTS ON  
PROPOSED AMATEUR RADIO OPERATION IN THE 2200 AND 630 METER BANDS**

In their August 31, 2015 filing, the Utilities Telecom Council reiterates their previously stated concerns about the possibility of amateur radio interference to the operation of PLC systems; and further reiterates their concerns that amateurs might use their licensed and allocated status to force power utilities to discontinue operations, despite acknowledging the FCC's own statement in 15-50 that this will not be allowed to happen. Both concerns are now unwarranted.

**Interference by Amateurs to PLC Operations**

While nominally supporting the proposed EIRP limit and 1 km separation requirement at 2200 meters, UTC once again states an unrealistic view that amateur operation is random and unpredictable and must therefore be restricted to the greatest possible degree, including no operation at 630 meters at this time.

The record in this proceeding (and in the previous Docket 12-338 proceeding) makes it clear that at these low frequencies, amateur antennas and ground systems require careful planning and installation. The only thing random about amateur activity is the time thereof, not the location. Also, it has been clearly established that amateurs have no interest in attempting

operation very near transmission lines because of noise considerations. Operation in either of the proposed bands is no trivial matter, and cannot be approached as such by the amateur. Other commenters in this proceeding have offered both theoretical analyses and empirical evidence that not only demonstrate amateur operation can be *and has been* conducted without interference to PLCs, but also that the amateur community is eminently aware of the risks and willing to take all reasonable steps necessary to mitigate them.

Thus, it is astonishing that UTC would even propose holding up an allocation at 630 meters on the grounds that “there is simply not sufficient understanding of the potential for interference between Amateur operations and PLC systems.” If anything, there is even more empirical proof that amateur operation can be conducted successfully and safely at 630 meters. The Part 5 license of ARRL has been public knowledge for nearly a decade, commencing not long after the effort in 2002 to obtain long wave amateur allocations; not to mention more than a score of other licensees operating over the same time span in an even wider part of the 490 kHz region than the proposed band.

The UTC filing appears to argue that the 472-479 kHz segment is even more crucial to their members, although they conspicuously neglected to cite any numbers of current users, or whether there has been any increase in use of that end of the spectrum since the last published numbers from 1999, or whether any PLCs currently operate between 472 and 479 kHz at all. The alleged need to delay action on a 630 meter allocation is completely unsupported.

### **Interference by PLCs to Amateurs**

The UTC original comments contend that PLCs should somehow be elevated in status to that of an allocated and licensed service. Apart from difficulties in seeing how this would be

possible without them also becoming allocated and licensed, the argument is once again the same as before about amateurs exploiting their allocated status. As it was stated this time:

Amateurs operating on a secondary basis in the 135.7-137.8 kHz band would be able to cause harmful interference to PLC systems, and would have priority over PLC systems that caused harmful interference to them, such that the PLC system could be forced to shut down if it could not correct the interference to the Amateur operation. Such a situation would be untenable for utilities, because it would threaten grid reliability.

Apart from amateurs repeatedly stating that they are willing to accept specific restrictions in these bands that don't apply to any other radio service, and apart from the Commission stating that this won't be allowed to happen, UTC's assertion is unsupported for a very practical reason. In the decade or more of Experimental Service operation, not one Part 5 licensee has complained about interference from PLCs. Their presence has been noted, but has never caused problems.

At 630 meters, in all my searches of correspondence and email group archives, I cannot find one mention of a PLC even being heard in that band.

Therefore, the only reason a PLC interference complaint might arise in future is either from an egregious malfunction, or else new construction. The latter possibility can be totally averted by prohibiting new systems being installed in the proposed bands. As I stated in my own comments and ARRL stated in their reply to comments by UTC, the affected 9.1 kHz of spectrum is negligible out of the 9-490 kHz span available. This requirement would impose no burden whatsoever on the industry, but would head off the possibility of a conflict entirely.

**Respectfully submitted,**

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**September 30, 2015**