

Comments to FCC regarding 630 meter NPRM  
Neil Klagge

**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 the Final Acts of the  
World Radiocommunication Conference  
(Geneva, 2012)(WRC-12), Other Allocation  
Issues, and Related Rule Updates**

**(ET Docket No. 15-99)**

**With regard to a distance restriction for amateur radio operations on the 472-479 kHz band,  
between a high voltage power line (with PLC's) and an amateur radio antenna operating on that  
band.**

I operated WG2XSV from November 2013 to June 2014 on 472-479 kHz with 1 watt ERP when I lived in Layton Utah. I made approximately 2500 hours of transmissions. There was a three phase high voltage transmission line **only 432 feet east** of my location. The power line towers were very large and probably carried several hundred kilovolts. I verified the distance to those lines by using the "ruler" feature in Google Earth from my address which was 1102 East, 3325 North in Layton UT 84040 at that time. There were no incidences of any interference to any neighbors or any possible PLC transmissions or receptions during the time that I mentioned above.

Now, since moving to Vancouver WA in the summer of 2014, I have been transmitting a beacon nightly with 1 watt ERP on 475 kHz since October of 2014. My antenna is about 1075 feet from a power sub-station carrying three phase power. There have been no incidences of any interference to neighbors or to any possible PLC transmissions or receptions up to the present while at this location.

I believe that amateur radio and PLC's can coexist on the 472-479 kHz band and I further believe that a distance restriction should be made that is less than 1/2 kilometer between the amateur station and a high voltage power line carrying PLC's. I believe there were only 15 PLC's in the US operating in that band in 1979\* compared to the lower frequencies, which makes coexistence on 630 meters less of an issue.

I want to thank the FCC for considering an allocation on 630 meters for amateur radio.

Respectfully submitted,

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\*from NTIA REPORT 85-181, page 3-17, table 4