

I am concerned about the propagation of the proposed BPL system that would adversely affect amateur radio frequencies.

FCC Part 15 rules require that the operator of an unlicensed emitter not cause harmful interference to authorized radio services. The absolute emission limits and the non-interference rule work together to allow most unlicensed devices to operate without causing widespread interference.

BPL is different from point-source emitters, however. Access BPL systems are not local in nature. They are expected to occupy entire communities. BPL systems do not create "birdies" on specific frequencies. They create radiated emissions at the FCC limits on entire swaths of spectrum.

If interference occurs from localized "unintentional radiator" sources such as power line noise, solutions exist. For example, power companies can change cracked insulators. The FCC has been able to enforce these rules when necessary. Indeed, a number of electric utilities have received letters from the FCC, as have the neighbors of hams who own and operate noisy Part 15 devices.

In the case of access BPL, if an amateur doesn't have the broadband system installed in his or her own house but experiences interference from signals radiated via the overhead electrical wiring, the only real solution could be to turn off the BPL system in entire neighborhoods. As a practical matter, that is unlikely to occur.

So, amateur radio stations, that provide emergency communications capabilities, like those used to support the police and fire departments and government agencies after the 9/11 terrorist attacks, are at risk of being interfered with by this type of proposed technology. I would urge strong consideration against the propagation of this technology to prevent unnecessary broadband interference.

Thank you for your consideration.

Regards,

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