I have been closely involved on both a professional and hobby basis with radio technology since 1970 and the Internet since 1994. In addition I am a licensed radio amateur holding the Extra class call sign of N1OL.

The HF radio spectrum is used by a very diverse selection of users both here in the US and overseas. Users such as transoceanic aircraft depend on reliable HF communication to maintain safety and interference with HF communications could potentially put people's lives in jeopardy. In addition there are many other users who have no alternative to HF radio to maintain communications.

Existing part 15 devices radiate from a single location and in the event of a problem are easily identified. A case in point was the recent tracking of interference to air traffic control from a baby monitor. BPL will radiate from multiple locations with interference that sounds like "white noise" and the source of interference will be difficult to locate. To enable the tracking of interference from BPL, a 5 wpm Morse ID could be added to the BPL signal every 5 minutes so that the source of interference can be rapidly identified without needing complex decoding equipment.

BPL (called PLT in the UK) was first introduced in Manchester U.K. in 1997 and the FCC may find it useful to review two reports prepared by the BBC in the UK that carefully examines the signal levels at which BPL systems can operate without causing interference.
The two reports can found here;
http://www.bbc.co.uk/rd/pubs/whp/whp-pdf-files/WHP012.pdf
http://www.bbc.co.uk/rd/pubs/whp/whp-pdf-files/WHP004.pdf