

I am an amateur radio operator involved in emergency communications. One aspect not evaluated in the NOI is the issue of aggregate interference from proposed BPL systems. Part 15 rules generally see each part 15 device as independent devices. The malfunction of a device causing interference is considered an independent event from the pool of deployed devices. BPL acts as a system. While there are a huge number of part 15 devices deployed, they are of differing design and most are not intentional radiators, and certainly not intentional radiators on the national power grids. If BPL implementation is to be considered, Part 15 rules need to be amended to reflect the potential for aggregated effects of such devices as interference generators in aggregate. One can easily imagine a situation where one BPL device deployed in a home setting would not itself cause interference, whereas a group of devices acting together could. I recommend that if BPL is deployed a method be required to control groups of BPL devices which would effect a group disable command. Such a technology would then be used to determine if interference to a licensed service was due to groups of BPL devices. The ability to disable individual BPL devices would allow a more selective search for sources of interference. Pauses in data stream of a few seconds on occasions where interference sources were being sought would cause reasonably minimal downtime in such a system.

Stephen Holland, KD4TTC