

Upon reviewing the comments already filed in this matter it appears there is great concern for interference to current licensed users of radio spectrum and users of part 15 devices.

I am surprised by a dearth of comment from the Federal Aviation Administration. Many of the frequencies used by BPL will those used by international flying aircraft, both passenger and military. Certainly BPL interference of mere seconds to an Air Traffic control reception site may result in great loss of life if a controller does not get all of a communication accurately.

In addition, the FCC will have to depend on Electric Power Companies ability and willingness to prevent and correct emissions at levels exceeding FCC regulations for BPL. The FCC already has guidelines that Electric Utilities must follow with regard to Power Line emissions and interference. I have personal experience with New York State Electric & Gas (NYSEG) that indicates their willingness to cooperate in mitigating interference caused by their equipment is at best labeled....shoddy. I have documented every call and writing to NYSEG and their responses to my complaints of Television and Radio Interference. I have designed my own direction finding devices that are able to pinpoint exact causes of Power Line interference. I have offered my findings to NYSEG on numerous occasions. In addition, their technical abilities and personnel offered for solving interference problems are virtually non-existent. A check of FCC records will show a history of complaints concerning Utility Power Line interference and a pattern of slow or half hearted responses to the complaining party. Indeed, FCC has already levied fines against Electric Utilities for slow response to interference complaints.

In my own case, when I threatened to complain to the FCC, NYSEG officials replied in writing, that the FCC no longer has any authority over Power Line Interference.

In spite of the tremendous proliferation in services requiring Radio Frequency devices over the past 20 years, FCC's ability to enforce it's regulations have been severely reduced by cut backs in budget and spending. Cost cutting has resulted in certain communications services with virtually no enforcement of FCC regulations. This has resulted in R.F. transmitters requiring licensing being used without licenses, excess radiated R.F. energy above what is regulated, interference to other licensed services and every day abuses of written regulations going unchallenged.

It is a well know fact that FCC monitoring facilities and personnel to operate them have been drastically reduced. Designing regulations to control emissions and possible BPL interference to other services is simply not enough. When complaints of BPL interference come...and they will, the FCC will be dependent on the cooperation of the Utilities. In light of the Utilities dismal past performance regarding interference complaints and the FCC's limited enforcement capabilities, the allowance of continued BPL testing should be completely reconsidered. And possibly, at this time, the dropping of BPL as a form of communications transmission medium would be the appropriate decision.

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