

My name is John Twilley, and I hold an amateur radio license in the Amateur Extra class, so my comments will be from the perspective of a licensed user of the spectrum which will be impacted by both types of BPL systems.

"In-House BPL" uses the electrical system inside a house to provide a high-speed network. This BPL system differs from other in-house power-line communications networks in that most of the other systems are slower, use much less power, and are required to conform to existing Part 15 rules which require that licensed spectrum users are protected from unlicensed devices with regard to interference. Interference from this type of system will be far easier to isolate and identify than from the other type of system.

"Access BPL" uses the medium voltage power lines connecting individual buildings to the power network. This system would involve extremely wide distribution of signals spread across a large portion of spectrum encompassing multiple amateur radio bands. Tracking down interference like this would be very difficult for many technical reasons, including the simple number of power lines acting as unintentional radiators and the width of the spectrum involved.

Measurement procedures for carrier current systems should take into account the potential for certain power line configurations to radiate unusual amounts of energy. In addition, the FCC should provide guidelines for consistent testing in order to effectively resolve interference complaints.