

The full impact of BPL systems to licensed communications must be fully understood and characterized before any changes to emission limits are considered. Even at the current Part 15 limits, the widespread deployment of such a system is likely to cause severe disruptions to routine and emergency communications regularly provided by the amateur service. It is the FCC's responsibility to ensure that this vital role is not compromised.

There are several specific items that must be addressed with respect to BPL Systems:

- 1) The distributed, wideband nature of the emissions. Part 15 limits, which are based on point emitters, may not apply. The overall impact on a larger area, particularly those served by overhead power lines, must be taken into consideration.
- 2) The uncontrolled nature of the transmission lines at HF. Power lines are designed for 60Hz. The response at RF is uncharacterized and uncontrolled, and constantly changing. For example, simply changing the position of a light switch can change the transmission line characteristics.
- 3) The effective isolation of interference from customer sites. This applies to both broadband and non-broadband customers. For example, someone who uses a HomePlug type system that creates interference on the power lines. The power utility must be able to isolate this interference from the power lines. Even if the power customer is not a broadband customer, the deployment of BPL may enable the interference to propagate where it otherwise may not.
- 4) The protection of licensed users of the bands. Power utilities are notoriously unresponsive when it comes to RF interference. The FCC should mandate specific requirements (response time, etc.) for the resolution of interference problems.
- 5) Susceptibility. Legal operation of an amateur HF station near overhead powerlines could potentially cause internet service blackouts in an improperly designed system. Legal, licensed operators must be protected.

Please consider this carefully, as everyone who uses the airwaves is potentially affected.

Thank you.