



UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

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Mr. Edmond J. Thomas
Chief, Office of Engineering and Technology
Federal Communications Commission
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Washington, D.C. 20554

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Federal Communications Commission
Office of the Secretary

Subject: Request for Waiver filed by Current Technologies LLC for Broadband
over Power Line (BPL), February 6, 2003

Reference: "Inquiry Regarding Carrier Current Systems, including Broadband over
Power Line Systems," Federal Communications Commission, ET Docket
No. 03-104, released April 28, 2003

Dear Mr. Thomas:

The National Telecommunications and Information Administration (NTIA), Office of Spectrum Management reviewed the subject request for a permanent waiver of the field strength limit specified for Class B emissions in Part 15 of the Commission's Rules. While noting that a number of limiting conditions are proposed, NTIA believes that a permanent waiver should not be granted at this time because of the present lack of measurements and analyses showing that any resulting interference to allocated services would be at acceptable levels. One concern is that the proposed pole-mounted interface devices and outdoor power lines used for BPL could be located close to public safety mobile and base station receivers operating in the 30-50 MHz frequency range and consequently many of the intervening signal paths would be unobstructed. The unobstructed and ubiquitous nature of this BPL application, and perhaps other aspects of BPL, differs considerably from the situations presently found in typical unintentional radiators authorized under the Commission's Part 15 Rules. We also have concerns regarding compliance measurement techniques for BPL systems and the characterization of emissions from a BPL system for use in compatibility studies.

We believe the continued operation of BPL systems on an experimental basis will provide an excellent opportunity to examine many of the issues raised by the Commission in the above-referenced Notice of Inquiry (NOI). NTIA has begun technical studies to address some of the interference-related issues raised in the NOI, including measurements and analyses, which will help determine the least constraining BPL emission limits that would preclude unacceptable interference. Our Spectrum Engineering and Analysis Division is conducting these studies and developing a measurement plan with the Institute for Telecommunication Sciences (ITS). Measurements at two BPL demonstration sites are tentatively scheduled to start late in July 2003.

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We understand that the Commission also may be conducting BPL measurements. In order to establish the best possible common technical basis for our respective analyses, I suggest that our BPL measurement efforts be coordinated at an appropriate technical working level. We look forward to working with the Commission's staff in developing the appropriate regulatory framework to permit BPL to evolve while protecting Federal and public safety systems.

Sincerely,



Fredrick R. Wentland
Associate Administrator
Office of Spectrum Management