

This comment is directed as a reply to a comment filed by Southern Linc, Southern Telecom Inc., and Southern Company Services (henceforth Southern) dated July 7, 2003.

Under section IV. subsection B of this comment (page 23 of 31, second paragraph), Southern maintains that Broadband Over Power Line (henceforth BPL) developers do not have the burden to prove that their part 15 devices must not cause harmful interference to licensed HF services such as Amateur Radio.

This writer disagrees. The FCC (henceforth Commission) has recognized that licensed users of a spectrum have primary use of their respective spectrum. Part 15 specifies that devices under its regulatory oversight must not cause harmful interference to licensed services.

This writer has completed research on the BPL issue, and believes that its potential to interference is very great. So great, that the current rules regulating BPL should not be relaxed, as suggested by BPL pronents such as Southern.

The burden of proof with respect to interference potential is on BPL proponents: they must prove that their BPL systems do not cause a potential to harmful interference to licensed services on the HF spectrum (Amateur, Maritime Mobile, etc). BPL proponents such as Southern maintain that BPL technology does not and will not cause harmful interference to licensed services as mentioned above.

This writer believes that the arguments for the widespread deployment of BPL do not outweigh their potential to interference to licensed services operating in the HF spectrum. This writer urges the FCC to follow the lead of Japan and Germany with respect to BPL: do not allow its widespread deployment due to its potential to harmful interference. Broadband providers can utilize other technology (such as WiFi, 802.11) to deliver services to rural homes without as great of potential to harmful interference as BPL.

Respectfully submitted.

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