

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
 )  
Inquiry Regarding Carrier Current Systems ) ET Docket No. 03-104  
Including Broadband over Power Line )  
Systems )  
 )

**Comments of Amateur Radio Station KF7IQ  
General Radiotelephone Operator PG00006746**

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**14 August 2003**

**Broadband over Power Line (BPL) systems using the existing electric distribution grid to provide last-mile high-speed access and home networking, enabling advanced utility applications too promote energy efficiency, critical infrastructure reliability and security should be heavily scrutinized and proven not to induce interference to any existing radio services using the radio spectrum.**

**Utilities have engaged in several significant trials producing questionable results regarding interference to licensed radio services. Many of the technical hurdles to BPL deployment in the U.S. have been overcome, however the number of qualified federally licensed participants used in these studies to determine interference levels to the utilized radio spectrum seems to be limited. As a result, utilities interested in commercial deployment of BPL systems, which will be determined in large part by the technical rules that the FCC ultimately adopts, should be required to prove beyond a reasonable doubt that no interference to licensed radio services will exist.**

**The author of this document believes that if BPL is aloud to proceed, BPL devices be classified as Class B devices as described in Part 15 rules and regulations and that these standards should apply to Access BPL equipment on medium voltage lines as well as devices installed at the Internet access point in the home. The Commission should consider the**

**use of newer practices with higher reliability to provide consistent and repeatable results being adopted and used to measure radiated and conducted emission limits from both Access BLP and In-home BPL devices as the primary means of preventing interference. The author of this document believes that the existing Part 15 rules for carrier current systems is inadequate to protect licensed radio services from interference, and that the existing Measurement methods and Verification process for equipment authorization should be examined and modified to insure no interference to licensed radio services be experienced.**

**WHEREFORE, THE PREMISES CONSIDERED,** This author is pleased to provide these comments on the NOI.

**Respectfully submitted,**

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