

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 )  
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Reply Comments of Scott Ginsburg

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General Reply Comments:  
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I would contend that the general viability of the Amateur Radio Service is in conflict with the wide deployment of BPL in the U.S. per existing Part 15 regulations for the following two reasons:

1. Potential interference on currently allocated Amateur frequencies from 2-54 MHz preventing communications by Amateurs in direct support of public service
2. Curtailing the growth of the Amateur Service, and quite possibly triggering its eventual demise, due to the possible inability of existing and future Amateur operators to successfully utilize the Amateur HF bands due to high noise levels from BPL systems

Reply to Industry Claims of No Interference:  
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Not one of the industry comments on NOI 03-104 that I read provided either technical or empirical evidence, through modeling or actual measurements on Amateur Service frequencies, proving that their respective BPL systems did not produce interference on Amateur HF frequencies.

Not one of the industry comments that I read indicated that these corporations are proactively working with the American Radio Relay League (ARRL) to ensure that BPL would not raise the existing noise floor of an Amateur HF receiver. Why?

Recent field evidence collected by the ARRL has clearly demonstrated the interference potential to Amateur HF receivers.

Suggestions for Potential Coexistence of BPL and the Amateur Service:  
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1. Disallow the use of frequencies between 2-54 MHz for BPL transmissions.
2. If frequencies from 2-54 MHz will be used, disallow use of frequencies currently allocated to the Amateur Service including sufficient guard bands around those frequencies. In this case, require BPL systems to be frequency agile; should the Amateur

- spectrum expand in the future, the BPL provider must relocate any existing transmissions away from that newly allocated spectrum
3. Provide a streamlined complaint system that requires a prompt response and resolution mechanism to any demonstrated BPL interference problem on Amateur Service frequencies. Define substantial fines and penalties for failing to respond and resolve complaints within a reasonable period.

Conclusion:

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I respectfully request that the Commission consider the appropriate technical solutions and Part 15 changes as applied to BPL to ensure no current or future interference to the Amateur Service. Given the strides that BPL equipment manufacturers have made to date, they have clearly demonstrated their ability to solve technical problems related to Data Over Power Line systems, and should be capable of ensuring no interference to the Amateur Radio service interference occurs while still providing BPL access.

Further, I respectfully request that the Commission require close cooperation of both BPL equipment manufacturers and utility providers with the American Radio Relay League (ARRL) in working to ensure BPL transmissions will not cause any interference to Amateur Service allocations. This cooperation should include joint field measurement and test efforts.

The Department of Homeland Security, and other Federal agencies consider Amateur Radio important in the national interest. The appropriate weight should be placed on ensuring no Amateur interference will be caused by BPL, and the ARRL should be involved at every step of the regulatory process.

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Respectfully yours,  
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