Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the matter of

Inquiry Regarding Carrier Current Systems, Including Broadband over Power Line Systems		ET Docket No. 03-104

To: The Commission

From: Robert L. Atkinson
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15 August 2003

Reply Comments of Robert L. Atkinson
ARS Station K5UJ, FRN 2908671
To the Comments of the United Power Line Council, Dated 7 July 2003

1. This is a response to the United Power Line Council filed comments to the effect that broadband over power line (BPL) field trials revealed no reported interference to other services:

   ”**B. Interference**
   In this proceeding, the FCC inquires concerning the potential for interference from BPL systems under the existing Part 15 emission limits, and it inquires whether the existing measurement procedures are appropriate. The UPLC is pleased to respond that there has been no interference reported in any of the field trials by its members. These trials have been conducted in accordance with the existing Part 15 limits and measurement procedures. In many cases, the FCC has assisted in the test measurements that have been taken. The experience gained from this process indicates that BPL systems comply with the Part 15 limits, and that the existing rules protect licensed users against interference from BPL systems. If anything, the existing rules may be too stringent and unnecessarily limit the range of BPL, but certainly the emission limits do not need to be reduced to prevent interference.”(*)

2. The statement by the UPLC is disingenuous. It attempts to imply that since there was “no interference reported in any of the field trials by its members” there must not have been any objectionable HF emission. The UPLC may argue about their intent with this statement but it is difficult to give any weight to it since the exact location of these field trials was not given (see ref. 5 p. 2 of UPLC filing). However, the American Radio Relay League (ARRL) sent a representative to four trial towns(**) in which he roamed the streets in a vehicle equipped with a HF

transceiver, and a mobile HF antenna. The RFI received was severe. A video of this trip showing the receiver S meter, and audio of the RFI is available for viewing at http://216.167.96.120/BPL_Trial-web.mpg (for high speed connections) and http://216.167.96.120/BPL_Trial-small.mpg (for dial-up connections). Note that the RFI is constant while the operator is spinning the tuning knob on the transceiver and that the signal strengths likely would have been much greater with full sized/gain antennas.

3. The UPLC's comments fail to answer these important questions: Were there any HF spectrum users such as short-wave radio listeners and amateur radio operators active in the field trial areas? Were all inhabitants of the trial areas told of the trials in advance? Did the UPLC members receive no complaints of interference from trial area residents? Were these residents given instructions on what to look and listen for in the way of interference from BPL, and how to report this interference if found?

4. Until the UPLC can truthfully answer yes to these questions and allow outside NGO observers access to their trials, statements such as the one quoted in paragraph 1 above, and a claim of Part 15 compliance will not have much significance and should be disregarded by the FCC. Further, it should invalidate the UPLC's assertion that Part 15, pertaining to BPL, may be too stringent, which is made in the second half of the UPLC's statement above. On the contrary, based on the video evidence given above, and in the absence of extensive information on the UPLC's tests, it might reasonably be said that the portion of Part 15 governing BPL emissions is generally too lax.

Respectfully submitted,

Robert L. Atkinson

*See p. 9-10 and also p. 12 of UPLC filing available at:
http://www.uplc.utc.org/file_depot/0-10000000/0-10000/7966/conman/03-104+Comments.doc

** http://www.arrl.org/news/stories/2003/08/08/2/?nc=1 paragraph 6.