

Before the  
Federal Communications Commission  
Washington, D.C 20554

In the Matter of: ET Docket No. 03-104

To: The Commission

## REPLY COMMENTS OF M. PHILIP SALAS

### I. Introduction

The FCC stated in their NOI ET Docket No. 03-104 that they seek information and technical data so as to evaluate the current state of BPL technologies and determine what changes to Part 15 of the Commission's rules are necessary for deployment of BPL technology. This document comments to those responses on record.

### II. Reply Comments

I have reviewed the comments made by Amperion, Inc., Electric Broadband, Phonex Broadband Corporation, PPL Telecom LLC, and Current Technologies LLC. It seems that these companies spent much more time extolling the virtues of BPL than providing the information the Commission requested. Even the so-called field trials were poorly done, or not done at all.

Amperion, Inc commented that deployments of BPL occurred in several locations in partnership with utility companies and conducted extensive emissions testing. However, there was no data provided. They stated that no complaints occurred while testing took place. However, how many of the potentially affected users even knew when and where the testing was occurring? I am an Amateur Radio operator and I work all week. If I turn on my radio at night or on the weekends and find a high level of interference, I turn off my radio and hope it goes away over the next few days. If not, I try to find the source of the interference. This can take weeks or months. Without knowing specific details of the field trials, affected persons would have no idea who to complain to.

Electric Broadband also provided little information on the impact of interference to HF users. They actually even stated that existing HF spectrum users should "be held responsible for taking steps to mitigate their vulnerability to interference." This is completely contrary to current Part 15 rules which states that Part 15 devices must not cause interference.

PPL Telecom LLC stated that measurements were made at some homes, but they did not provide any data as part of the NOI.

Current Technologies LLC stated that the HF spectrum is already noisy, and rules should be implemented quickly to enable BPL technology. No interference/field strength information was provided as part of the NOI.

### III. Conclusion

There has been virtually no data submitted by those favoring BPL that shows a lack of interference to current HF users. Meanwhile, information has been provided by the ARRL – both calculated and demonstrated – showing how bad BPL interference is. The Commission is asked to AGAIN review the ARRL's very detailed comments provided as part of the NOI. Also please review [http://216.167.96.120/BPL\\_Trial-web.mpg](http://216.167.96.120/BPL_Trial-web.mpg) which shows the demonstrated impact of BPL interference at HF.

Further, other studies are also on-line that demonstrate that BPL does cause interference to HF users. Studies can be found at:

[http://www.jarl.or.jp/English/4\\_Library/A-4-1\\_News/jn0208.htm](http://www.jarl.or.jp/English/4_Library/A-4-1_News/jn0208.htm)  
[http://www.darc.de/referate/emv/plc/VERON\\_PLC\\_Report.pdf](http://www.darc.de/referate/emv/plc/VERON_PLC_Report.pdf)  
[http://www.qsl.net/rsgb\\_emc/PLTREP.pdf](http://www.qsl.net/rsgb_emc/PLTREP.pdf)  
<http://www.darc.de/referate/emv/plc/plc-oh.pdf>

Before BPL can be implemented, the results of the above studies and demonstrations need to be addressed. Further, testing of BPL technology must be done in a manner such that potentially affected users are informed ahead of time and have the ability to evaluate the impact of BPL on their HF communications systems.

Respectfully

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