

Extreme caution is needed to avoid collateral disruption and national security exposures from proposed BPL services. While I am primarily concerned about potential disruptions to the amateur radio service, citizen and government day to day activities also appear vulnerable.

Although BPL emissions are, apparently, designed to fall within FCC Part 15 guidelines, their low wattage emissions when combined with the widespread antenna systems which power lines can provide, become similar in effect to high wattage emissions with consequent disruptive results. In the past, Part 15 has presumed (and required) finite antenna lengths. BPL, by its very nature, fails to fall within this presumption. In the case of BPL Part 15 rules would appear to be insufficient to prevent harmful interference.

Because BPL signals will be carried widely through the power grid, they will be available to anyone with appropriate technology to eavesdrop and/or disrupt, whether intentional or unintentional. Certainly, any new system such as BPL is not in the best interest if it has the potential to compromise existing services and create new privacy and security exposures.