

In reference to proceeding 03-104, the Broadband over Power Line Technology, (BPL), extraordinary consideration must be given to creating regulations concerning the efficient resolution of interference and other complaints.

Unlike Cable Television distribution that uses shielded, enclosed, co-axial cables, power transmission's unshielded, exceptionally long wires are excellent antennas at currently proposed BPL bandwidth. This characteristic will undoubtedly have unexpected, far-reaching effects, creating issues with many systems currently in place.

Locally, for instance, traffic light control signals are passed through power lines. Interference with these signals could at least cause traffic snarling and at most could create catastrophic losses to life, vehicles, and property. Because no studies have been published concerning the effects on these systems, extraordinary measures must be implemented for dealing with any such contingency.

Additionally, South Carolina Highway Patrol mobile units operate in the 41.00 Megahertz band that will be part of the proposed BPL spectrum. If emergency calls are blocked by BPL, what is the result?

Further, no studies have been conducted to evaluate effects of BPL on medical equipment prone to degradation from radio frequency signals. Effects on MRI equipment, for instance, or pace maker devices have not been addressed.

Moreover, when BPL encounters dissimilar metals or galvanic joints on corroded power lines that act as harmonic generating diodes, how will government radio, cellular, PCS, and hospital telemetry data systems be affected by the wideband signals generated from such common power line defects? No comprehensive studies have been made to date.

Lastly, no studies have been performed to show BPL's immunity to existing services, such as broadcast, low-band VHF business band, and public safety radios that operate at high power in mobile units. How will outages on BPL be reported and located?

Officials in the Japanese Communication Bureau have abandoned BPL, as the management of interference is prohibitively costly. Our Commissioners must not ignore this issue, as they may become liable for any losses incurred from permitting BPL to exist without interference resolution.

Allow me to propose that the FCC generate regulations to force BPL providers to create a department within the BPL provider company to handle BPL complaints exclusively, giving them broad power to cease operation of the BPL network locally if significant hazard is observed in it or other RF systems. Further, the FCC should create the same autonomous department that has sweeping powers to enforce CFR 47, Part 15 rules, not to the exclusion of the shutdown of interfering parties and levying of stiff financial penalties on repeated offenders. The fines and forfeitures described in current legislation are not sufficient to induce compliance.

Such departments must have toll free access numbers published on power poles and in local telephone directories.

CLEARLY, if this issue is NOT addressed, the FCC Commissioners will have conclusively stated that distribution of Internet services -- an activity not required for protection of life and limb in any way shape, form, or fashion --

is more important than existing emergency networks, EAS, EAN, commercial broadcast radio, hospital, health, and public service radios.

Certainly the Commissioners do not want to make this embarrassing statement.