

The proposed rulemaking regarding Part 15 and Access BPL is insufficient to protect the legitimate spectrum for licensed users. The HF/low VHF range has the propagation potential to travel great distances and interfere. Unlike other Part 15 devices which transmit for relatively short periods, BPL will be a 24/7 source of interference. Signal levels should also be related to time to minimize spectrum pollution and an unacceptable level of background rf affecting other services, especially amateur and others whose method of operation inherently requires reception of weak signals which are the ones most likely to be affected by continuous emission by BPL.