

As an electrical engineer, an employee of a large public electric utility, an amateur radio operator, and a former firefighter, I must express my concerns regarding BPL (Docket - 04-37). Note that I am not opposed to the implementation of BPL; however, I am very uneasy and apprehensive of its use.

My anxiety is two-fold. First, from an electric utility perspective, I am concerned about our responsibility to ham operators, shortwave listeners, low-band licensees, even the few of us who still choose to use antennas for viewing broadcast channels. At present, we already dedicate a considerable amount of manpower in tracing the source of "normal" power interference. I can't imagine how much more complicated this will become when we will be faced with BPL interference as well.

Secondly, as an amateur radio operator for more than ten years and a lover of the public spectrum, I am worried about especially smaller utilities who do not presently do much to ensure that their system is not emitting interference, who do not have the expertise nor the equipment. With no stronger, more specific language than what presently applies according to Part 15, I fear the worst.

It seems to me that the only way to successfully implement BPL is to limit the frequencies to non-licensed frequencies. Then, of course, there is the concern of harmonics. I suppose that is why the FCC exists, to resolve such issues.