

I strongly support the following points for inclusion in any ruling with regard to the operation of BPL services anywhere within the United States and urge the Commission to include them in rule making:

Performance standards must be established for interference mitigation. Mitigation must be available 24/7, and must be immediate upon receipt of a complaint.

The BPL data base must be readily accessible to the public and kept up to date.

Because mitigation is impractical in the case of mobile stations, a radiated emission limit sufficient to protect mobiles must be established and enforced.

BPL systems must be tested for rules compliance by an independent laboratory prior to initiation of service.

To ensure an informed marketplace, marketers of BPL services must give clear notice to consumers that licensed radio services have priority and that the delivery of BPL services therefore cannot be guaranteed. Receipt of this notice must be acknowledged in writing prior to the signing of any contract for service.

There must be severe penalties for non-compliance with these rules.