Dear FCC:

Title 47 of the Code of Federal Regulations Part 15 (Part 15) was created to "regulate and /or limit" the radio frequency (RF) emissions from unlicensed devices that could or can generate RF interference to other licensed or unlicensed services, devices and/or systems. Those devices regulated by Part 15, are devices that generally operate within a narrow band of frequencies and at extremely low power densities.

I do not believe that Part 15, as it currently exists, was authored to cope with a very broadband of RF frequencies, from 2 MHz to 80 MHz, composed of square wave pulse data, emanating from every power line in the Nation. This condition can occur with the roll out of Broadband over Power Line (BPL) or Power Line Communication (PLC) systems as currently proposed. The synergistic effect of thousands of signal injectors, line amplifiers and other components (while each is within Part 15 limits), using unshielded transmission lines over thousands of square miles in this Nation can generate a "blanket" of RF interference that at a minimum will disrupt the majority of High Frequency (HF) communications. This HF RF interference will particularly affect mobile radio services operating within minimum distance of power lines (parallel roadways) or fixed services near to source. Many of these services are involved safety, health and welfare of this Nation. Additionally, the RF interference from BPL/PLC to devices within buildings and homes may cause these devices to not function properly and may require extensive filtering or blocking for proper operation.

The concept that the BPL/PLC equipment manufacturers, BPL/PLC service providers and electric utilities will or can "self-regulate" a system intended to cover the entire Nation is laughable at least. Reference the electric power problems after deregulation of the power industry. Complains currently against power line noise, generated by dirty insulators, damaged insulators or poor electric connections, are numerous and are generally ignored the electric utilities. Many of these noise problems are only resolved after the complaint is addressed by the FCC.

While Part 15 puts the burden to prevent and/or remedy RF interference problems on the BPL/PLC manufacturers, providers and electric utilities; it does not provide sufficient assurance that any and all complaints of interference from BPL/PLC, will be addressed in a timely or satisfactory manner. Part 15 should be revised to contain a specific method/mode of registering a complaint(s) and an escalated penalty, time based, for failure to address complains of RF interference in a timely and satisfactory manner. Complaints of RF interference should be handled by a National Clearing Center, fund by providers/utilities and staffed by personnel independent of the same providers and/or utilities.

The deployment of BPL/PLC may be a worthy goal for the Nation, but it should be done based on good engineering principles, unbiased test results and proper planning. And supported by necessary regulation and oversight to prevent RF interference pollution.

Proven alternatives to BPL/PLC already exist and may prove to be more economically feasible to that a faulty nationwide BPL/PLC system, in terms of both financial investment and National safety.

/s/ Kenneth L. Fleming