

This correspondent is an Amateur Extra Class licensee with forty-three years' experience in the Amateur service. As a physician and medical school professor I am well aware of the value of accessible digital communications for the public good. As an experienced amateur I am dismayed by the impending dissemination of BPL, but I recognize its inevitability, at least until its technical and economic deficiencies become apparent. BPL as it is now being proposed will be both the cause and victim of crippling interference, and will end up being a disappointment to both users and entrepreneurs. But for now, so as to give BPL a fair chance and to protect current users of the HF spectrum, certain measures must be adopted:

1) It is imperative that a database be accessible to the public to assist in locating BPL system operators. However, the actual proposals contained in the NPRM do not mandate a publicly accessible database. Nor is there any mandate that databases be kept current. Without such mandates, databases would be of no value. This reminds me as a physician of those health insurance customer manuals full of out-of-date information and phantom providers.

2) I strongly agree with the assertion of the American Radio Relay League that the FCC must establish performance standards for BPL interference mitigation. To offer any real protection to licensed services, the rules must require that interference be resolved immediately. There must be severe enforcement penalties for failure to resolve a complaint in real time and for failure to maintain the database. This is especially necessary for the conduct of services that provide emergency communications, such as USCG ship-to-shore, FEMA activities, and ARES, for whom minutes can mean lives.

3) BPL systems operating at the present Part 15 limit have been shown cause harmful interference to HF mobile stations. These stations are usually the mainstay of emergency and public service operations. If a BPL service is operating in the vicinity, the only protection will be an absolute limit on radiated emissions that is lower than the present limit. Studies must be undertaken with all due dispatch to determine scientifically what that limit must be.

I maintain my skepticism about BPL but would derive no particular satisfaction from "I told you so," and would be pleased to be proven wrong. If BPL is to have any chance to succeed in coexistence with current users, the measures here proposed should be adopted.