

Like the M-1 tank sent to cut the one-year-old's birthday cupcake, "Access BPL" is not the right vehicle for bringing broadband internet access to all Americans and the Commission needs to keep BPL on a VERY short leash.

BPL trials conducted in other countries -- as well as the few limited (indeed almost secret) trials in this country -- demonstrated that the existing "Access BPL" technology creates harmful interference to other users of that radio spectrum. We should follow the lead of other countries and send the BPL folks back to their laboratories to develop a better mousetrap. Relaxing current part 15 rules to permit a higher device input levels will result in correspondingly greater harmful interference to government, amateur and others who use those same frequencies for both emergencies and day-to-day operations.

Industry pleas that it MIGHT successfully eliminate such harmful interference on specific frequencies at specified locations have not been tested, and the proposed rule needs to clearly state that harmful interference to licensed services will simply not be tolerated, period. Harmful interference radiating from their (sometimes poorly maintained) systems is already a concern and introducing broadband signals onto the power distribution system is not likely to improve either the level of interference or their timeliness in stopping the interference.

Have you so soon forgotten the debacle that resulted when public safety agencies and cellular providers, both operating their systems "within the rules" found that there were -- and still are -- serious interference issues to mobile public safety communications from operations at the "cell towers".

The proposal needs to require that the "Access BPL" provider demonstrates an ability to identify devices on their facilities that are causing harmful interference -- independently of interference reports received from the "victims" (who may be unable to alert the BPL provider) -- and act in real time to eliminate the problem, since emergencies -- and the communications required to save lives and lessen human suffering -- happen at unpredictable times and locations.

Further testing of the potential for interference to BPL operations from other users of the radio spectrum may tell us that BPL would not even be a reliable internet system and dangerously inadequate as a system for the power companies to use to control their distribution system.

Protection from harmful interference to radio frequencies used for emergency, public safety, aviation, military, and other licensed users MUST be the Commission's first priority.