

My name is Martin Campbell. I hold two Associate of Applied Science degrees in Computer Science, and am a qualified Electronics Technician, as well as a Licensed Amateur operator (since 1990).

While I think that BPL should be banned as it has in several other countries, I understand that the FCC is going to allow its deployment here in the United States. I believe that much more testing by independent testing agencies is necessary to make sure that no interference to licensed and unlicensed services alike occurs. I believe that Shortwave and AM broadcast listeners deserve the same protection from interference generated by BPL systems as any user of a licensed service. If interference occurs, it must be ELIMINATED (NOT reduced!) Immediately. This must include any measures necessary, up to and including shutting down an entire BPL system.

The Amateur Radio Relay League (A.R.R.L.) says on their web site;

"The improvements we have in mind include:

Performance standards 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."

These are the changes that the A.R.R.L. feels are necessary. I agree with these changes, but they do not go far enough in some aspects. I think that the customers who sign up for BPL services MUST read and sign a contract that clearly states that they understand that their service may be cut or changed if any interference to a licensed radio service results, and that they also understand that their service may be disrupted by users of licensed radio services. Further they must state that they understand that they have no legal remedies, and for that matter no right to complain about such service outages except to their service providers. Subscribers to BPL services must be made to understand that they are not allowed to complain to, or harass in any way any user of a licensed radio service whom they perceive to be disrupting their BPL service. The burden of explaining these facts must be placed on the BPL system provider ONLY, as must be the SOLE responsibility of immediately resolving any interference issues. Users of any licensed service must not be expected to make any adjustments to their antennas or equipment (provided that the said equipment and/or antennas are in compliance with FCC rules for that service) or reduce or limit their use of said equipment in any way so as to reduce interference to BPL systems or users.

To me, there is no "tolerable level" of interference. I will give an example of why I think this way. I monitor the Maritime Mobile Service net on 14.300 MHz on a daily basis. Many boats and small ships at sea depend on this net should they have trouble, and other means of communication are not available. So do many missionaries and others in remote areas where phones are unreliable or non-existent. Signals received from these stations are often very weak. Any interference at all could keep the net operators from hearing a desperate call for help. This net and others, are run by Amateurs who feel that they provide an important service. These nets have saved lives and property many times. I feel that it is important that they can continue to do so without ANY interference from BPL operations.

These are just a few of the many reasons that the deployment of BPL systems must be closely and carefully watched and regulated so that current users of the HF and VHF spectrum are not interfered with in any way by interference from any BPL system.

Thank you for taking the time to read my comments.

Martin Campbell