

Thank you for the opportunity to comment on the FCC's Notice of Proposed Rule Making (NPRM) on Broadband over Power Line (BPL) systems, ET Docket No. 04-37. The new rules apparently require identification and mitigation against interference. This is a step in the right direction.

I welcome competition and the opportunity for everyone to participate in the internet. However, the more I thought about this the more concerns come to mind. There already excessive interference to almost every service. Some of the new interference is likely from this source - possibly even some distance away due to skip. It is currently impossible to tell since part 15 signals have no ID.

I am an amateur radio operator "ham" in an area where this service is not yet available. Even in my location ham radio is a more and more frustrating hobby due to the excessive base line noise and QRM mostly due to poor enforcement of current part 15 device rules. Many have "dirty" signals. I honestly don't think the FCC has a good track record with part 15 regulations or for that matter prompt enforcement of general broadcast regulations until it is too late. As you know (and should be trying to encourage) some hams operate on world-wide on less than five watts. I had even planned on starting to operate using very low power. Encouraging unshielded RF on power lines may make low power operation even more difficult; if not impossible.

I strongly support any plans to ID signals. I think the FCC has a responsibility to go the extra mile with this new source of RF and assure that if it interferes with legal operations of other services then the source can be identified and reported back to the source.

Hams also don't need new groups of people to complain of our legal operation. This was the case with poorly constructed television receivers before cable. A nearby 1KW ham station or lower power mobile station may occasionally shut down this new internet service. After that time loss of connection will often be blamed on amateur radio operator. Even if consumers know that they are subject to interference from pre-existing services I expect any decision to encourage RF on power-lines will ultimately result in laws passed by congress to further limit amateur radio as a hobby.

The loss will be great. This was way for young people to get involved in science and engineering. Kids usually get distracted into games on the internet. Loss of amateur radio operators also reduces the pool of people interested in emergency communications. Cell phones and emergency communication systems don't always work - especially if overloaded due to a disaster.

In my opinion vendors of this service should be initially required to stay completely away from the amateur radio bands and future amatuer bands, radio telescope frequencies, medical telemetry, commercial broadcast services and emergency services bands until they have proven their technology. Frequency segments

specifically identified by the ARRL or others for licensed low power operation should be completely excluded. There should also be a way to identify the source so we can work with the companies before we go to the FCC.

Please use your regulatory power to encourage amateur radio and investment in more robust and reliable ways to get internet into every home such as twisted pair (DSL), cable, fiber and so forth.