

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC. 20554**

In the Matter of)
)
Amendment of Part 15 regarding) **ET Docket No. 04-37**
new requirements and)
measurement guidelines for Access)
Broadband over Power Line)
Systems)

To: The Commission

**Continuing Request for Extension of Time from Nickolaus E. Leggett
N3NL Amateur Radio Operator**

The following is a continued request for extension of time for Comments and Reply Comments from Nickolaus E. Leggett, an amateur radio operator (Extra Class licensee – call sign N3NL), inventor (U.S. Patents # 3,280,929 and 3,280,930 and one electronics invention patent application pending), and a certified electronics technician (ISCET and NARTE). I also have a Master of Arts degree in Political Science from the Johns Hopkins University (May 1970).

The National Telecommunications and Information Administration (NTIA) has just transmitted their very large engineering study of actual Broadband over Power Line (BPL) interference to the Commission and posted the study on the NTIA Internet web site. This study, *Potential Interference from Broadband over Power Line (BPL) Systems to Federal Government Radio Communications at 1.7 - 80 MHz - Phase I Study*, (NTIA Report 04-413) was transmitted and posted on April 27, 2004.

This study is a large engineering document that is highly relevant to the successful conduct of this Federal Communications Commission proceeding.

All parties need to read, evaluate, and comment on this vital engineering study. There is not enough time between now (April 28, 2004) and the comment due date of May 3, 2004 to accomplish this task in a complete manner. In addition, the engineering study being conducted by an independent contractor for the American Radio Relay League, Inc. is still not yet available.

As a result of this situation, I am formally requesting that the Comment period and the Reply Comment period be extended by six months (180 days). This extension of time will make sure that the Commission's primary duty of protecting the integrity of the radio spectrum is carried out.

This is a continuation of my original request for an extension of time that was submitted on February 24, 2004. Refer to Appendix A for a copy of my original request.

Respectfully Submitted,

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April 28, 2004

Appendix A - My Original Request for an Extension of Time

Before the

**FEDERAL COMMUNICATIONS COMMISSION
Washington, DC. 20554**

In the Matter of)	
)	
Carrier Current Systems, including Broadband over Power Line Systems)	ET Docket No. 03-104
)	
Amendment of Part 15 regarding new requirements and measurement guidelines for Access Broadband over Power Line Systems)	ET Docket No. 04-37
)	

To: The Commission

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N3NL Amateur Radio Operator**

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The released Notice of Proposed Rulemaking (NPRM) has a Comment Date of 45 days from publication in the Federal Register and a Reply Comment Date of 75 days from publication in the Federal Register.

The National Telecommunications and Information Administration (NTIA) is conducting an engineering study of actual Broadband over Power Line (BPL)

interference. Also, the American Radio Relay League (ARRL) has an engineering firm under contract conducting a study of BPL interference. Both of these important studies are ongoing at this time and are expected to be completed and made available to the public within a couple of months.

This NPRM is highly dependent on engineering data. The quality of the issued rules for BPL would be improved by providing the public with the opportunity to read, evaluate, and comment on these two engineering studies.

The current periods of time for Comments and Reply Comments are too short to allow the public the opportunity to review these engineering studies and comment for the record.

As a result of this, I am requesting that a period of six months (180 days) be added to both the Comment and Reply Comment periods. This extension of time would allow all parties the opportunity to examine and comment on the BPL engineering studies that are currently being conducted by the NTIA and by the ARRL's engineering contractor. In addition, any other ongoing studies of BPL could also be included in the record of formal comments.

The additional step of including these engineering studies in the formal record would strengthen any BPL rules that the Commission develops. This is an important consideration since those rules may be challenged in the Congress and the courts.

Respectfully Submitted,

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February 24, 2004