

The concept behind Access BPL is an interesting one, to say the least. The ubiquity of power lines would theoretically make it an ideal solution to the last-mile problem of wired telecommunications. Except for one small problem. Ideal solutions never are.

One item of note is the state of In-House BPL systems and their precursors. Public satisfaction, in my experience, with these devices is incredibly low. The sheer number of complaints about these simple implementations of the concept of data over power lines with regard to quality and interference leads me to wonder whether or not a nationwide network of data communications over the seemingly omnipresent power lines is a wise idea. While I'm aware that Access-BPL and In-House BPL differ, I offer it up as an analogy.

While the concept of increased competition in the broadband market is an especially exciting concept to me, I cannot help but wonder if the necessary steps have and will be taken to ensure that the interference caused by Access BPL is minimized. I am not opposed to BPL, though it might sound that way. I merely look back to the introduction of Cable Internet access, and the inherent difficulties there, even considering the regulations that were imposed. Quality of delivery is even still rather less than ideal, and the concerns with respect to interference would be multiplied a thousand fold with BPL.

The primary focus of this NPRM is, of course, interference with various spectra. My comments on quality of service merely serve to illustrate that should the FCC desire BPL to be a viable alternative to DSL and Cable access, it must be acceptable to the public, and provide reliability without significant cost, either monetarily or with respect to other services. Both of these issues are still questionable, and I would encourage the FCC to reevaluate the criteria for interference measurement and reduction for many reasons.

Notable is the lackluster implementation of Cable access upon entrance to the market, and I suspect that providers of BPL would also cut corners, especially with respect to quality of service and adherence to regulations governing interference, when they could get away with it. Furthermore, even given the fullest faith and effort of a BPL provider, the magnitude of the power line system would cause the emergence of unforeseen problems. Ideal solutions never are. The more complex and large-scale a system becomes, the more unmanageable the constituent parts, and the more unforeseen consequence crop up. I say this not to discourage the development of Access BPL, but to encourage the reevaluation of interference criteria before significant investment is made in deployment, BPL providers become behemoths and problems become irresolvable.