

Dear Commission,

As a FCC licensed radio amateur of 30 years I am very concerned about the implementation of Broadband over Power Lines.

I realize that BPL can currently operate under FCC Part 15 rules, but I do not believe part 15 goes far enough for a system such as BPL. The NPRM reaffirms the important principle that licensed services must be protected from harmful interference and are not required to protect BPL systems, which is good, but I am not sure that I can take for granted that this will be honored in practice or even in a timely manner.

The NPRM proposes additional, new constraints on BPL to protect licensed services, however I do not feel they will be enough.

I believe a lot more testing and technical documentation needs to be presented to verify that the BPL provider can, without a doubt, protect licensed "over-the-air" transmissions and reception without interference. I do not believe the BPL providers can do this and still maintain the level of service they are promising.

The NPRM does not address interference issues pertaining to mobile and portable operations, which can be compromised during times of emergency or training.

I do not believe the providers have the RF trained personnel nor the infrastructure to handle wide-spread interference complaints. If interference complaints cannot be addressed in a timely manner the provider should shut down the system until which time such interference can be eliminated.

The RF spectrum is another national resource. Just like water or air, once it is polluted it is very hard to clean up. It is my wish that the implimentation of BPL should not be rushed and careful consideration to the modification of Part 15 rules for it's operation. BPL providers need to be aware of the interference issues and have proper procedures for mitigating such complaints.

Thank you.

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