

As an active licensed amateur operator (callsign KM20), an active volunteer in ARES and RACES in my locality as well as a frequent user of the HF bands, I ask that the Commission carefully consider the research report and comments on this Docket that it was provided on April 27, 2004 by the National Telecommunications and Information Administration.

Of particular note are the following comments from the report's Executive Summary:

"Critical review of the assumptions underlying these analyses revealed that application of existing Part 15 compliance measurement procedures for BPL systems results in a significant underestimation of peak field strength. Underestimation of the actual peak field strength is the leading contributor to high interference risks. As applied in current practice to BPL systems, Part 15 measurement guidelines do not address unique physical and electromagnetic characteristics of BPL radiated emissions."

The findings of the NTIA back up earlier reports by the American Radio Relay League (ARRL) and others that BPL transmissions will likely cause harmful interference to other spectrum users. The NTIA study indicates that present Part 15 rules are not enough to deal with instances of interference caused to weak signal reception. I urge the Commission to carefully consider the NTIA comments showing that as presently proposed, BPL services are not like other Part 15 services.