

The recent NTIA report concerning Access BPL states the following "Underestimation of the actual peak field strength is the leading contributor to the high interference risks. Part 15 measurement guidelines do not address unique physical and electromagnetic characteristics of BPL radiated emissions". Thus it is obvious that the FCC does not even know what protection is necessary to protect licensed services from BPL interference. Thus it is obvious that when the FCC says licensed services will be protected from BPL interference (04-37) that they (the FCC) has underestimated the interference problem. Part 15 rules as presently in force offer little or no protection to the licensed services. About one year ago the FCC and the Bush Administration decided to push for the introduction of BPL and to reject any technical or scientific data that would question BPL development. The licensed services that make use of radio frequencies in the HF and low VHF spectrum have no reason to expect any protection from BPL interference from the FCC. It is a done deal, and no amount of data that questions Access BPL development will be permitted to change the plans already made for rapid deployment. Future events will prove this argument to be true. Richard Nielsen