

There is a lot of politically correct rhetoric in the Notice of Proposed Rule Making 04-37. An enormous amount of emphasis is placed on the possibilities of BPL. The undeniable reality is that BPL creates interference as evidenced by BPL equipment manufacturers and power companies using that equipment. Who determines if the interference is acceptable, the FCC, the equipment manufacturers, the power companies or licensed radio services? Because the manufacturers and power companies know that BPL causes interference, I consider the interference to be intentional, malicious and with total disregard to licensed radio services.

Do not allow BPL equipment manufacturers and power companies to determine what is acceptable interference. Because of BPL's revenue generating potential, it is highly unlikely that their recommendation will be fair and unbiased. The higher the level of interference allowed by the FCC the higher their profits. You should set the standards based on "real world" field trials. Those trials should be conducted in neighborhoods where radio amateurs are active. Until now, amateur radio operators have not been allowed to be involved. Unless you obtain all the available information, you will not be able to make a just decision.

Based on BPL technology, there are configurations and/or conditions that could help minimize interference issues: 1) Require all amateur radio bands to be notched out in their entirety; 2) Provide a common database of BPL operations so that individuals could pin-point BPL providers; 3) Set a time limit on interference mitigation with monetary penalties; 4) Create a department within the FCC to ensure accurate unbiased test results of BPL operation.

Once the interference of BPL pollutes the airways, so much money will have been invested that you will not be able to reverse the pollution. Please disregard the emotional pleas of possibilities in order to see the technological reality of BPL. Only then will you understand the importance and consequences of your decision.

Respectfully submitted by Amateur Radio Station N4RE