

With the strong probability of interference from BPL to licensed users, I appreciate the FCC recognizing the need for strengthening the existing Part 15 rules with regard to BPL. Proponents of BPL may argue additional rules are not necessary because, as they advocate, BPL does not cause interference. However, the ARRL has shown by actual field measurements BPL causes severe interference. If BPL does not cause any interference, as the proponents contend, additional rules will cause no hardship to the companies planning to commercialize BPL.

In Paragraph 34 of the NPRM the FCC states "we note that hundreds of kinds of unlicensed devices are successfully operating under the current Part 15 limits without causing harmful interference to licensed operations." This may be true but I know of no other Part 15 device which currently operates over such a large area as the power distribution system except the incidental radiation of the power system itself. All other Part 15 devices are confined to a home or business and it is unusual for the radiation from that device to leave the vicinity of the device. The exception is the existing power distribution system. Radiation from the power distribution system is minimal except when a fault exists. Overall, the power industry does not have a good reputation for repairing these faults when they occur. One only has to review the FCC's Enforcement Log to verify this. Should BPL be implemented in an area it is unrealistic to expect the power industry's record to be any different in the future.

In Paragraph 35 the FCC states "We therefore would expect that, in practice, many amateurs already orient their antennas to minimize the reception of emissions from nearby electric power lines." This is absolutely false. As an amateur radio operator for over 30 years I have established a station in many different locations and NEVER have I oriented my antenna "to minimize the reception of emissions from nearby electric power lines." I know of no other amateur operator who has done this either. In fact, it is rarely practical. The power lines should NOT be radiating noise and I expect the power company to rectify any noise problem in a timely manner.

While the FCC has proposed some strengthening of the existing Part 15 rules as applied to BPL, I believe further strengthening is necessary.

As mentioned above, the power industry does not have a good reputation of solving interference problems in a timely manner now. The Part 15 rules should include a time frame in which any interference from BPL must be solved. I would recommend 24 hours or less. If the interference is not solved within the time frame specified, stiff financial penalties must be imposed. Since the proponents of BPL insist their systems do not cause interference including this in the Part 15 rules should be welcomed by the BPL advocates.

Part 15 devices, in addition to not causing interference TO licensed services, must accept any interference FROM licensed services. Tests by the Amateur Radio Research and Development Corporation have shown data transmission of a BPL system can be

interrupted with as little as 4 watts of transmitter output power. Typical amateur radio stations may utilize 100 watts of transmitter output power while some use the maximum allowed of 1500 watts. Consumers of BPL services must be made aware that their internet service is susceptible to interruption at any time from licensed radio services. While this could be accomplished by some fine print in a users manual it should be a requirement that consumers read and signify by signing that they understand this susceptibility. THIS IS CRITICAL as most consumers do not have the knowledge to understand why their internet service suddenly quits working and may blame the licensed radio service for the failure.

I appreciate the opportunity to comment on this NPRM and hope the FCC will move forward in a way that fully protects licensed radio services from interference.

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