Thank you for considering the following comments regarding BPL Rules. The classification of BPL as an "unintentional radiator in the class of CCS" appears to be incorrect. CCS is typically in the VLF and LF frequency sprectrum. BPL will be deployed using the HF sprectrum which is most useful for long range communication due to the skip characteristics of HF frequencies. Clearly there is great potential for interference not only local but at very long range from the BPL deploymemt site. Even at low power levels as required for Part 15 devices the potential for disruptive and continuous interference to all modes of HF communication is more likely than not. While the NPRM provides for a centralized database and some requirments to attenuate or notch out interference it is not clear as to how the licenced user of HF sprectrum can identify the offending BPL provider and how the licenced user can control the interference caused by a provider at long distance in a timely way. The propagation characteristics of the HF bands change continuously. This will most likely impose a requirement for continuous adjustment of BPL power levels and frequency changes but it is unclear and perhaps impractical for the BPL provider (attempting to provide reliable service) to make these adjustments on a as needed basis. The deployment of multiple BPL points of service will make it difficult if not impossible to identify the source of interfercnce. Perhaps there should be a phase-in period during which the skip type of interference can be measured and the actual impact of BPL can be measured by licenced users of HF with accurate reports sent to the appropriate agency. The goal of providing high speed internet access to everyone is commendable but there is a very high risk of fatal interference to other currently licensed users of the HF sprectrum.