

Comments on Broadband Over Power Line
Docket- 04-37

dear Sirs:

I am opposed to changes in Part 15 (unlicensed devices) Rules. If anything, the existing rules need to be strengthened.

It is clear to any high school physics student that BPL is incompatible with other licensed users of the high frequency r.f. spectrum (2-80 mhz).

The Access BPL operators ought to be considering using frequencies below 550 khz and above 1.2 ghz, if they must pursue this unsound technology application. The r.f. spectrum is a natural resource and pollution of a frequency range that has unique skip potential is squandering a valuable natural resource.

My comments regarding the Proposed issues on Part 15 are as follows:

1. Maintain the Existing Part 15 Emission Limits for Access BPL. There needs to be clarification regarding average, peak, and on going intentional signals on the r.f. spectrum as the result of operating BPL.
2. Require Access BPL Systems Employ Interference Reduction Techniques. This should include complying with existing Part 15 rules, employment of a shut down features for operators found to be interfering with other services. The complaint notice and resolution should be done promptly.
3. Require Access BPL providers to maintain a data base of installation locations and technical information at both the local and federal level. Information should include: type of equipment, frequencies used, level of power and what mitigation techniques are employed. A history of site complaints should be shown. Information should be readily accessible.

Very truly yours,

Robert F. Hutchinson