

As a licensed radio amateur, I wish to express my agreement with ARRL's position (as stated in the May 2004 QST page 9 editorial) regarding this NPRM. Specifically, I agree with ARRL that the following safeguards, beyond those noted in the NPRM, are needed: (1) specific performance standards that BPL providers must meet in mitigating interference, (2) a public database of complaints and their status, (3) emission limits, (4) independent testing of BPL systems prior to initiation, (5) a requirement that BPL providers must notify potential customers of the interference potential, and (6) severe penalties for noncompliance. Severe interference to the Amateur Radio service and other services is inevitable with BPL, as demonstrated by the ARRL's study, the recently completed NTIA study, and the experience of other countries which have abandoned BPL due to interference. Given the dismal record of power companies in resolving electrostatic interference from poorly maintained power lines, it is unrealistic to believe BPL providers would put forth good faith effort to mitigate BPL interference without effective enforcement. Without the additional safeguards I noted above, enforcement would be impractical