

1 May 2004

Federal Communications Commission  
Washington, DC

Reference: Docket 04-37

Subject: BPL Access

To Whom it may Concern,

I am writing to express my concerns over Docket 04-37 and what it will mean if the FCC does not place adequate constraints on the implementation of BPL. The concerns raised stem from a report issued by the NTIA summarizing the NTIA's study of BPL.

The risk of interference with other licensed services in the HF bands is of serious concern. The NTIA report states that the methods for measuring the interference caused by BPL need to be changed in order to rightfully measure the impact to other licensed services. The FCC needs to be responsive to this reported concern by NTIA before any full scale deployment of such systems.

The report also states that it can be expected that there will be interference to aircraft communications. Certainly this needs to be addressed and mitigated prior to allowing full deployment of such systems.

I applaud the Commission's move to implement interference mitigation measures for BPL. My fear is that these will fall short of what is required to keep the interference to a minimum. I recommend requiring a public database be kept to help with interference mitigation. There should also be a requirement to have interference complaints identified and resolved in an expeditious manner with failure to comply accompanied by severe penalties.

I have personally heard the interference caused by BPL through the trials being conducted by Alliant Energy here in Cedar Rapids, Ia. In my opinion, this is the RF environmental equivalent of dumping toxic waste into a city's water supply. With the full deployment of these systems, the RF pollution will be significant with effects that may not be fully understood until it's too late.

With the HF spectrum full of BPL signals, nationwide HF communications in support of homeland security will be crippled. As the Department of Homeland Security moves to implement HF Networks for nationwide communications, BPL could very well defeat the purpose of the Network. The same follows for the Amateur Radio Operators who would support emergency traffic nets through the Amateur Radio Service. Whether a natural disaster occurs or a terrorist attack, we need to understand the ramifications of BPL interference across the HF spectrum on emergency communications.

In summary, the FCC needs to fully consider and act upon the NTIA report on BPL. Full RF interference mitigation of BPL on licensed services needs to be implemented with quick resolution and severe fines for non-compliance. And finally, the FCC needs to think through the far-reaching consequences of interference across the HF spectrum on emergency communications in case of a natural disaster or, heaven forbid, a major terrorist attack.

Thank you for your consideration of this comment.

Sincerely,

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