

These comments are for the docket 04-37, BPL.

I am an amateur radio operator and I am concerned that the proposed rules do not address the interference issues adequately. The proposed interference mitigation requirements fall far short of providing real protection from harmful interference to licensed operators using the same radio spectrum as BPL.

We need a public accessible database where we can get enough information to contact the local broadband operator immediately to notify them of interference problems. Your proposed rules don't have that requirement.

We need requirements in the rules that interference issues be resolved immediately. Your proposed rules don't have that requirement.

There must be enforcement penalties for BPL systems operators that don't resolve interference issues immediately. Your proposed rules don't have the penalties.

In my experience as a member of the greater Cincinnati amateur radio interference committee, if there are not airtight rules, the power companies will drag complaints along until the amateur operator gives up. In the last few years we have investigated several complaints of electrical noise interference from our local company, Cinergy. In each case they denied it was their problem for a long time and finally after months of phone calls to them, the Ohio utilities commission and the FCC, they would fix the troubles. In the mean time, the amateur radio operators affected by this interference were effectively off the air, unable to hear other stations due to the noise.

We don't need that type of headache with the BPL systems. Draw up standards that require immediate interference mitigation performance.

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