

May 3, 2004

Subject: Docket 04-37 (Broadband over Power Line)

Part 15 rules are designed to regulate low power unlicensed RF devices that might provide single-point RF interference to a licensed service. BPL deployment will result in RF emissions from an infinite number of locations simultaneously. Part 15 rules are inappropriate for addressing BPL and its multiple point radiation potential.

Another issue that has not been fully explored is the potential intermodulation problem. A fully deployed BPL system radiating various amounts of RF from an infinite set of points through the system, utilizing an unpredictable set of frequencies from 2-80MHz. in close proximity to any number of licensed HF/VHF services will result in 2nd and 3rd order intermodulation products that would be beyond the ability of the Cray to compute in our lifetime. Public safety and other services can not be guaranteed interference free operation.

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