Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
CARRIER CURRENT SYSTEMS	)	
INCLUDING BROADBAND OVER POWER	)	
LINE SYSTEMS	)	
	)	**ET Docket No. 04-37**
AMENDMENT OF PART 15 REGARDING	)	
NEW REQUIREMENTS AND	)	
MEASUREMENT GUIDELINES FOR	)	
ACCESS BROADBAND OVER POWER LINE	)	
SYSTEMS	)	

To: The Commission

COMMENTS OF RICHARD A. BLACK, JR., K4RAB

Access BPL Emission Limits

The tremendous potential of BPL to cause devastating interference to licensed services such as the Amateur Radio Service has been well documented elsewhere. Suffice it to say that Part 15 is woefully inadequate to deal with BPL, due to the wide swath of the radio spectrum it occupies, and the ubiquity of the power lines over which it would work. BPL systems should be expected to radiate no more than cable TV systems. If BPL is unable to meet that standard, than it should not be allowed to operate.

Burden of Proof in Interference Cases

The burden of proof in resolving interference cases should rest on the BPL operator, NOT on licensed services making complaints as the Commission has proposed.

Interference Mitigation

Interference Mitigation techniques mentioned previously in BPL proponents comments essentially amount to *interference reallocation*, not interference mitigation. The first principle of interference mitigation in a residential neighborhood should be to *not use at all* frequencies that might be in use by licensed services there. This includes *all* amateur frequencies, and frequencies allocated to international broadcasting.

BPL System Database

The Commission has proposed that BPL operators be subject to a notification requirement similar to those for power line carrier (PLC) systems. Due to the vastly

increased potential for interference from Access BPL systems to licensed systems, this database should be available as public record and be maintained independently of the BPL and power generation industries. This information can not only be useful in resolving individual instances of interference, but for discovering patterns of interference by BPL manufacturer and system type, and patterns of interference from individual power companies. Complaints against systems, power companies, and manufacturers should be included and displayed publicly. A centralized, nationally available database would be far more useful than smaller decentralized databases for discovering inherent interference issues with different types of BPL systems.

General Comments

While there is intense political pressure in this country to expand the coverage of broadband Internet access, BPL is an option that should be approached with utmost caution. Most proposed BPL systems operate in an especially sensitive portion of the radio spectrum. (The HF range from 3-30 MHz) The potential for interference to other communications systems is enormous, far more than with any other form of broadband access. Taking NO action on this proposed rule making until the complete NTIA study on BPL is released and rigorously evaluated would be especially wise.

While I fully support universal broadband Internet access, I believe that BPL, despite the claims of the BPL industry, is a gross spectrum polluter. There are other, far better alternatives available, such as broadband wireless and fiber, which will be the building blocks of far more robust broadband systems, and do so without causing the massive interference certain to be inherent in most forms of BPL. If the power industry in this country would like to go into the broadband business, I would suggest that they install fiber networks and use those networks to provide not only broadband Internet, but also telephone and television services, providing competition for both cable TV and telephone companies.

Respectfully Submitted,
Richard A. Black, Jr., K4RAB
2127-I Powers Ferry Road
Marietta, Georgia 30067