

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

In the Matter of)
)
Amendment of Part 15 regarding new) ET Docket No. 04-37
requirements and measurement)
guidelines for Access Broadband over)
Power Line Systems)

REPLY COMMENTS ON NOTICE OF PROPOSED RULE MAKING

To The Commission:

I have a BS in electrical engineering, have in the past worked for a power and distribution transformer manufacturer, a manufacturer of amateur radio equipment, and a manufacturer of high end test equipment, and I've been chief engineer for a couple AM radio stations while holding an FCC First Class Radiotelephone license. I have held an amateur radio license for over forty years, extra class for thirty. I've published articles in two ham radio magazines and one company newsletter. I've had my share of experience on the ham bands including Worked-All-States (WAS) and Worked-All-Continents (WAC) certificates using no more than five watts output from, or ten watts input into, my transmitter, many evenings operating HF portable in the parks, and pedestrian mobile on ten meters. I've come across and dealt with various noise and interference problems from Part 15 devices which I've either solved, compromised with, or moved away from.

I am replying to comments filed on behalf of ARRL on 5/3/2004. I support in principle the ARRL's contention that BPL requires "considerably more conservative emission limits compared to normal Part 15 devices," and that the whole BPL proceeding should be put on hold until appropriate technical standards can be developed. This principle of added care in developing such standards— —even if it means a delay— —should be familiar to, say, anyone who has ever built a house.

"Measure twice, cut once." Many a volunteer has heard and put into practice this construction proverb—usually after cutting something to the wrong length. After all, accurate measurements are essential in building a strong, durable house, and the time spent measuring materials carefully has lasting rewards.¹

Is developing the "robust infrastructure" that's much touted for homeland security less important than "building a strong, durable house"? If the robust infrastructure is

¹ Rebekah Daniel, "Habitat Houses Yield Safety and Security," *Habitat World*, April/May, 2004, p. 10.

indeed important, then "the time spent measuring [emissions] carefully has lasting rewards."

The Part 15 emission limit now in place is like that first measurement which isn't used in a careful construction until it is measured again. Sometimes that first measurement turns out to be wrong and the builder is glad he didn't commit himself to using it. The current Part 15 limit was made for an intermittent pseudo-point source and should not be used for BPL which turns out to be a continuous line source unless field studies actually show it to offer adequate protection to the over-the-air services that need quiet noise levels. If we are truly interested in homeland security, then we should take the time to get it right.

Respectfully Submitted,
Earl S. Gosnell III