

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC. 20554**

**In the Matter of** )  
 )  
**Amendment of Part 15 regarding** ) **ET Docket No. 04-37**  
**New Requirements and** )  
**Measurement Guidelines for Access)**  
**Broadband over Power Line** )  
**Systems** )

**To: The Commission**

**Reply Comments from Nickolaus E. Leggett  
to the Comments Filed by the American Radio Relay League, Inc (ARRL).**

The following are Reply Comments from Nickolaus E. Leggett, an amateur radio operator (Extra Class licensee – call sign N3NL), inventor (U.S. Patents # 3,280,929 and 3,280,930 and one electronics invention patent application pending), and a certified electronics technician (ISCET and NARTE). I also have a Master of Arts degree in Political Science from the Johns Hopkins University (May 1970).

My reply comments are directed at the comments filed by the American Radio Relay League, Inc. (ARRL).

In its comments, the ARRL states that Part 15 interference resolution “involves difficult negotiations with entities which are either unaware of their obligations under Commission regulations, or are simply uncaring.” (Paragraph 10 Page 11 of the ARRL comments)

**Children and Interference Mitigation**

How are children expected to conduct such difficult negotiations? Many new amateur radio operators, short-wave listeners, and model airplane flyers are children who are becoming interested in technology, electronics, and communications. These children

are completely unequipped to conduct “difficult negotiations” with large and impersonal organizations. How are children going to get the BPL providers to move the BPL noise so that the children can operate simple short-wave receivers and beginners amateur radio stations?

In those fortunate households with parents who are knowledgeable and interested in radio, the parents can do the bureaucratic work to get some spectrum cleared for their children’s radios.

What about children who live in households where the parents do not know anything about radio? This was my situation when I was a beginner in radio, and many others have the same experience. These children will be shut out of the radio world by a blanket of mysterious interference that will dampen their budding interest in radio and electronics.

### **Consequences of Blocking Children’s Access to Radio**

America is dependent on a constant flow of new participants into the scientific and technical fields. Many of these new young participants in technology start out as short-wave listeners, amateur radio operators, or radio-controlled (RC) airplane flyers.

The flow of this new talent can be inhibited by BPL adaptive interference mitigation systems that are “user hostile” to children and other newcomers to radio. This inhibition can be increased by additional negative factors such as homeowner association (HOA) prohibitions on outdoor radio antennas, light pollution blocking amateur astronomy, and government restrictions on model rocket building.

## **Children-Friendly Interference Mitigation Systems**

It is directly against the public interest of the United States of America to inhibit the movement of a new generation of Americans into science and technology. Therefore, the Commission must formally require that all BPL adaptive interference mitigation systems must be useable by children and must take children's interference complaints seriously. The Commission must establish specific requirements for children-friendly interference mitigation systems. This should include on-line tutorials with instructional materials at the appropriate grade levels to train the children in the BPL phenomenon and how to use the adaptive interference mitigation system.

This consideration supports the ARRL's comment that much more specific rules are required for any functional interference mitigation system.

**Respectfully submitted,**

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**May 20, 2004**

### **Notice of Service**

A paper copy of this Reply Comment has been sent by First Class Mail to the American Radio Relay League, Inc. at the address below:

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