Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	
Amendment of Part 15 Regarding New	)	
Requirements and Measurements Guidelines	)	ET Docket No. 04-37
For Access Broadband over Power Line Systems	)	
	)	

Reply Comments from Edward V Breeden III

After the original comment period ended for this docket item on Proposed Rulemaking on Access Broadband over Power Lines (BPL) I was struck by the overall sense that almost everyone other than the electric utilities had one common theme – "Not in my backyard". While it seemed that both commercial and municipal entities all said BPL might be good, none wanted the BPL signals in their particular part of the spectrum. Thus, I felt like a city hall meeting where everyone acknowledges the need for a landfill, but not in his neighborhood. And, I think this analogy is apt, in that no one wants the potential RF "hash" on his allocated frequencies.

I was also interested in the comments offered on page 8 of Progress Energy 's filing where it is stated that, "With regard to hams, it appears that they consider any interference to be harmful." This, I believe shows the fundamental misunderstanding by Progress Energy regarding interference on the "ham" bands. Amateur Radio Operators have contended with all sorts of interference for decades. This interference has ranged from other Part 15 devices like computers and computer monitors to interference from power companies themselves with faulty electrical components. However the prospect of continuous broad-spectrum interference over a wide geographic area is daunting.

Further contained in the Progress Energy filing (again on page 8) was a reference to our equipment used in detecting the BPL "signature" signal. Progress Energy stated, "It also appears that those that have submitted complaints about Progress Energy's BPL system intentionally seek out interference using very sophisticated and sensitive equipment." Again, Progress Energy shows a fundamental lack of knowledge about ham radio. I spoke with one of the hams who complained (Gary Pearce – KN4AQ) and found that he was using a FCC type-approved Icom IC-706 transceiver with his car mounted HF antenna. As the commission note, this is a common mobile installation. Does Progress Energy think hams still use spark-gap transmitters and crystal controlled receivers? With this knowledge gap at the local utility, how can they possibly assess the interference potential to our service?

BPL is an unproven technology in a wide scale deployment such as in a city the size of Raleigh, NC or larger. I urge the Commissioners to re-consider a rapid ruling on BPL standards until further technical studies have been made and the promise of BPL without interference be proven.