

Before the Commission
In the Matter of Broadband Over Power Lines (ET Docket 04-37)

These comments are in reply to the Comment of the NTIA Filed 7 June 2004:

The NTIA, in it's comments, has alluded to the possibility of requiring coded identification of BPL signals:

"BPL transmission of identifying codes could facilitate identification of BPL emissions using a conventional radio receiver; however, NTIA is further considering the potential need and whether transmission of such codes would increase interference risks."

I wish to strongly suggest that the commission require a human readable identification of all BPL signals, in a manner which will not increase the interference risk of the BPL signal. Further, each device comprising the BPL system which generates or re-generates a BPL signal in the downstream direction, and each device which re-generates a BPL signal in the upstream direction (effectively excluding the consumer's in home BPL modem) should be required to apply an human-readable identification at an interval not less than once each 10 minutes.

The identifier should include two components: (1) an identifier of the BPL system and (2) an identifier of the discrete BPL device generating the signal.

This proposal would serve 3 purposes:

- 1) Definitively identify the potentially interfering signal as a BPL signal;
- 2) Definitivity identify the specific interfering system component;
- 3) Alleviate and reduce to minimum the process of determining the "true" source of an interfering signal.

This will reduce the burden on both the complainant and the BPL provider in the initial stages of an interference complaint and will enable the BPL provider to respond swiftly and decisively to the complaint, without having to resort to shut-downs for the purpose of identifying the source of the interference.

The information database could then be simplified to the point of the complainant being able to enter the identifier into a web-based interface and immediately be provided with a complaint contact telephone number.

I leave it to the Commission, in consulatation with NTIA, to determine the type of modulation appropriate to this task, however, I would suggest that a Morse Code type modulation in the range of 5 to 10 words per minute rate would be appropriate, the required bandwidth and power requirements are low, hence lowering the potential for the identifier raising the radiated emmissions above the Part 15 limits.

Again, I urge the Commission adopt a requirement for BPL signals to include a human-readable component in order to reduce the burden on all parties when dealing with interference issues.

Respectfully submitted,

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