

BPL

Here are my points on the deployment and regulation of BPL

- **The HF based systems appear to be inherently flawed, with much more radiation than the proponents claim, as measured by NTIA and other organizations. Even before the trials have ended, the companies promoting BPL are refusing to respond properly to interference complaints, in some cases conveniently classing them as “not harmful” The only acceptable system appears to be the Corridor Systems technology, which uses UHF and Ghz range RF.**
- **The promotion of BPL systems appears to be much more of an economic and political decision than one with any sound engineering basis. All of the testing done by independent agencies show considerable potential for interference, yet the technology is allowed to proceed. It simply boggles the mind that a technology with such potential to harmfully impact licensed users of the spectrum is allowed to be deployed with the promise that they will fix the interference issues later. This paradigm of deployment is an invitation to disaster as there is a negative incentive for the BPL providers to recognize and mitigate interference post deployment.**
- **The HF spectrum, with it’s ionispheric propagation is a precious resource, used for public safety communications as well as international broadcast and communication, all of which would suffer irreparable harm if BPL systems operating in the HF spectrum were allowed to proceed. This is akin to setting up a polluting chemical plant upstream of a public beach and water supply, with the thin promise of ‘fixing’ the pollution later if it becomes noticeable.**
- **The FCC needs to be the central point of contact for all interference reports. This will allow the agency to understand the magnitude of the problem as it is occurring, allow it to be sure the appropriate BPL provider is contacted with the interference complaint, allow the FCC to monitor the response to the complaint, and allow the FCC to apply appropriate sanctions**

(immediate shut down of BPL system) if the complaints are not addressed in a timely and adequate manner. Any other method, such as having individual sufferers of interference contacting the power companies directly will not have the necessary safeguards and will a lot of potential for missed communications. Current experience with power companies about interference from line faults, leakage, arcing, etc has not been good. Licensed spectrum users need to have contacts in an agency that talks ‘downhill’ to the BPL providers to ensure compliance. In this new model where interference is not prevented, but rather is allowed to occur and then is mitigated – there needs to be a very strongly coupled monitoring and enforcement, and the FCC is probably the best agency for this purpose. It is also accountable to Congress, which will allow spectrum users additional input.

- Harmful interference needs to be defined by the FCC. It should be a definition that allows for weak signal work to proceed. The best would be to require the BPL system to be imperceptible to licensed users. This will probably require complete notching of all the frequencies used by public safety, amateur radio, shortwave broadcasting, radio astronomy, etc. Interference levels above S1 or S2 or which cover substantial portions of the bands in use at those levels are not acceptable.**
- The FCC needs to reaffirm the rights of the licensed users of the spectrum, particularly in a pre-emptive ruling that will enjoin local jurisdictions from imposing so called ‘quiet hours’, or other limitation on licensed users who may cause interference with BPL operations during normal operation. There is already the threat in the air to bring legal action against operators of radio transmitters that impede BPL operation – this is not acceptable.**
- The FCC should not relieve the part 15 limits to radiation with respect to BPL. The current part 15 limits are too lenient, as evidenced by the large amount of interference already experienced by many users, particularly mobile users.**
- The FCC should reaffirm the need to prevent interference to mobile users in the HF spectrum. At least one BPL provider is maintaining that interference to mobile users need not be**

mitigated. However mobile HF radio systems are some of the most valuable during emergencies, and are the only viable radio outlet for many users. Making them unusable in most areas supplied with power lines will severely curtail their installation, use and availability for emergency communications.

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