

In Reply Comment submitted 22 June 2004, APPA writes:

II. Existing Part 15 radiation limits for Access BPL systems are sufficient for limiting harmful interference to licensed spectrum holders.

Reply:

APPA is operating under a misapprehension. Signals have been indeed been identified, at levels sufficient to cause radio interference to Amateurs and short-wave listeners, and complaints of harmful interference, as defined at Part 15 and Part 2, from BPL systems purporting compliance with Part 15, have indeed been filed.

Moreover, APPA should be aware -- it is a matter of arithmetic -- that the interference levels permitted by Part 15 can exceed and have exceeded the level of signals received by short-wave listeners and Amateur radio operators up to more than a hundred meters from power lines supporting a BPL system. Given that power lines are usually much closer to residences, it is hard to escape the conclusion that Part 15 cannot protect radio reception from harmful interference generated by a nominally compliant BPL system.

Respectfully submitted,

Cortland E. Richmond, Jr.