

I urge the Commission to act with EXTREME caution in this proceeding.

Three services involve the operation of shortwave radio receivers in private homes: Amateur Radio, Citizens Radio, and International Broadcasting. The existing Part 15 regulations - **when enforced** - have proven adequate to preserve these services.

Unfortunately, compliance with Part 15 has been spotty and enforcement inadequate. So-called "touch lamps", for example, frequently wipe out reception in large parts of the medium- and short-wave spectrum.

Electric utilities themselves have had problems complying with Part 15. The Enforcement Bureau's website cites numerous instances where Bureau action has proven necessary to get a utility to address an interference complaint.

Ingress of shortwave signals *into* the lines is also a concern. Well-shielded cable TV lines frequently suffer interference from the licensed users whose spectrum they share. It is not at all unlikely that power lines will have the same problem. This is especially likely with the unshielded, unbalanced lines found within a home. ("In-House BPL")

Operation of a legal amateur or CB station stands a good chance of interfering severely with use of their bands for BPL. Consumers are almost universally ignorant of Part 15; even when aware of it, they will often seek other methods (peer pressure, local ordinances, civil suits, etc.) to shut down legal amateur operation.

You can see why radio amateurs are very leery of the prospect of BPL in the amateur bands!

Preferably, the Commission should prohibit the use of frequencies allocated to the Amateur, Citizens, or International Broadcasting services for BPL.

Barring that, the Commission should require transmissions in these services' bands to be spread-spectrum and with sufficient error-detection and/or correction facilities that the loss of all transmissions within these bands does not noticeably impact the function of the BPL equipment.