

After reading many comments from power companies, professional organizations and other organizations, there seem to be areas of the FCC's NOI that are vaguely considered in numerous ways and words of each commenter. Although my words may be no better or understandable, they follow this introductory paragraph.

Competitive Cost

Broadband Over Power Lines (BPL) will only be a competitive broadband choice if it can be supplied at a cost comparable existing ISP services. BPL is expected to allow power companies to deliver Internet access over the "last mile" to the customer. This proposed system appears to require all the existing Internet infrastructure and then some. Can the cost be competitive if more is needed to supply the access? Perhaps a better question might be –Couldn't existing systems be used employing the same BPL technology? Would the answer be they couldn't do the job within the FCC rules?

Avoiding Interference With Existing Radio Services

Avoiding harmful interference with multiple existing radio services in the same spectrum may appear surmountable when considering a stand-alone device. Considering the device will be connected to a large radiator (antenna) may complicate the process of limiting interference. Improvements in Part 15 rules may be necessary to the rules do not allow harmful interference.

No Change To Existing Part 15 Rules

Any BPL system should meet the existing requirements of FCC's Part 15 rules as they are currently written.

Improvements To Part 15 Rules To Limit Incidental Radiation From BPL

BPL may require a specific test as do computer CPUs and power supplies used in computers (Section 15.102). Part 15 rules should be improved to include a test of BPL devices that would incorporate connection of a radiator or antenna approximating the power line connection. The test should continue to limit emissions of BPL to current Part 15 levels. Should it be found that BPL is useless within these confines, perhaps the idea of BPL should be dropped. Allowing higher levels of emission could lead only to further relaxation of Part 15 rules. If BPL is viable within the current confines of FCC rules, it may have future merit.

Improvements To Part 15 Rules Limit Interference From Uncontrolled BPL Variations

Spectrum use limitations should be defined to avoid harmful interference to untold radio services. The Part 15 rules identify acceptable spectrum for power companies to use Power Line Carrier Systems (PLC) as incidental radiators within the frequency band 9 kHz to 490 kHz. There are very few radio services in this range and existing services have specific frequencies assigned such as Loran C at 100 Hz. Avoiding interference to other radio services can be accomplished but only when frequencies of proposed systems are known.

Improvements To Part 15 Rules To Identify The Party Responsible For Elimination Of Harmful Interference

Who will tell the consumer that they may not use a device that causes harmful interference to a radio service? Part 15 rules should specify if the consumer, BPL device manufacturer or the Power supplier is responsible for resolving harmful interference issues.

Improvements To Part 15 Rules –Clarification To Consumers

A paragraph should be added to the Part 15 rules that will require manufacturers and providers to give notice to consumers. The consumer notice should clearly indicate to users that BPL devices may affect or be affected by radio services. The notice should clarify that consumers must accept the interference from other radio services and that they may be asked to discontinue use of the equipment if they are the cause of harm interference to any radio service.

Thank you for reading these comments.

Respectfully submitted,

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