

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554
19 August 2003**

In the Matter of)
Inquiry Regarding Carrier Current)
Systems, including Broadband over) ET Docket No. 03-104
Power Line Systems)

REPLY COMMENTS OF DAVID A. LEWIS
To: The Commission

**REPLY COMMENTS of David A. Lewis
N1OL Amateur Radio Operator to the Comments Submitted by Sprint Corporation**

The following are reply comments from David A. Lewis, an amateur radio operator (Extra Class licensee - call sign N1OL), who has been closely involved on both a professional and hobby basis with radio technology since 1970 and the Internet since 1994.

My comments are a reply to the comments submitted by Sprint Corporation.

I strongly agree with the comments of Sprint Corporation that urges the Commission to ensure that there is no interference with existing licensed services.

In particular I would like to draw the commission's attention to Sprint's comment concerning the requirement by the FCC that licensed services periodically identify. This identification requirement is to enable interference

sources to be rapidly identified. The DSP chips and processors that are part of both access and in-house systems can easily be programmed to identify themselves on a regular basis in 5 words per minute Morse code with only minor software changes. This would enable any system that was causing interference be rapidly identified.

Comments have been filed that claim “no interference reports received”. I can comment from personal experience that many cases of digital noise interference (which BPL essentially is) are very difficult to identify and trace. BPL will be radiated from many points using the power system wiring as an antenna, as homeowners switch lights on and off there are changes in the wiring topology and hence the BPL antenna and the signal levels fluctuate widely which makes tracking time consuming and tedious.

It is almost inevitable that if BPL is permitted, BPL interference will on occasion disrupt “safety of life” communications and the problem system will need to be rapidly identified and closed down, if the systems identify on a regular basis with Morse code then the problem system can quickly be identified and the issue addressed.

Sprint Corporation recommends that a number of standard sponsors be involved in testing for interference and setting standards, I support this comment and request that the Commission recognize the skills and abilities of the ARRL and ask that they be requested to make a contribution to the standard setting process.

Respectfully Submitted,
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