

Comments on Docket 04-37:

My concern with the regulations proposed center around the utilities' requirement to "notch" out frequencies where they interfere with licensed services. In the Amateur Radio Service regulations, we are provided frequency bands not individual frequencies. As FCC rightly points out, no one individual "owns" a specific frequency. We are licensed to be able to use any frequency in the assigned spectrum for the Amateur Service Bands. Thus, for example, a properly licensed Amateur Radio Operator may be found anywhere in the 20 meter band between 14.000 and 14.350 MHz at any time.

If I am in contact with another operator on 14.195 MHz when the BPL tones wipe out that frequency, propagation may deteriorate in a short time and I may lose the ability to continue the contact. In addition, there will be a time lag between the frequency being wiped out and my ability to contact the utility and ask them to "notch" out the frequency. They will be receiving hundreds of these calls from licensed users asking for them to free up hundreds of individual frequencies at any time.

Will there be 24 hour a day coverage of a phone number for "notching out" frequencies?

Will there be personnel at the utility to "notch out" the BPL signal 24 hours a day?

How can the utility respond in a timely fashion to our requests to free the frequency?

The simplest answer would be for the utility to "notch out" the frequency bands licensed and assigned to the Amateur Radio Service. This eliminates the telephone traffic to the utility and ensures that these frequencies are free of interference from BPL operations.

A similar approach can be taken to eliminate interference with frequency bands assigned to government agencies, aircraft and other licensed users of the HF spectrum.

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