

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC. 20554

In the Matter of)
)
Amendment of Part 15 regarding) ET Docket No. 04-37
New Requirements and)
Measurement Guidelines for Access)
Broadband over Power Line)
Systems)

To: The Commission

**Reply Comments from Alan Erickson
to the Comment Filed by Alan Erickson**

**Comment document received/adopted 05/04/04 and available at:
http://gulfoss2.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6516183260**

A serious matter of BPL implementation is the issue of interference to licensed users of the spectrum such as Amateur Radio operators. This reply comment identifies information obtained after my original comment of the interference existing and continuing to exist at WØSR, operated by James Spencer and other Amateur Radio stations in Cedar Rapids, Iowa. This situation was identified in my original comment filing.

It is a further purpose of this reply comment to identify the potential for interference to a large number of licensed Amateur Radio stations over a broad geographic area should BPL be fully implemented in Cedar Rapids. The situation of James Spencer is from only a limited test site operated by the local utility. The "density" of licensed Amateur Radio operations was mentioned in my original comment filing, but without the supporting details provided by this reply.

Interference at WØSR, licensed to James Spencer, Cedar Rapids, Iowa.

The BPL Steering Committee (BPLSC) in Cedar Rapids, Iowa, conducted and documented extensive measurements of nearby BPL operation to licensed station WØSR. **The resulting test report is filed with the Commission as a separate reply comment document by the author, a member of the BPLSC, on the filing date of this reply comment.**

The BPLSC test report directly refutes claims no evidence of BPL interference exists. Those claims are likely based solely on the false belief that no formal evidence documenting such interference exists. The BPLSC test report provides that formal documentation for station WØSR. Besides James Spencer, at least four other fixed station operators in the vicinity of the Cedar Rapids BPL area are receiving interference and have filed a complaint with the local utility and the FCC. Further,

this documented severe interference is in a location where the utility is known to have taken Part 15 field strength measurements, and is presumed to be operating in accordance with Part 15 limits.

During the timeframe of the BPLSC report, which roughly coincides with the proceedings of ET 04-37, the interference has not been eliminated, nor have repeated requests for cessation of operation in accordance with FCC Part 15 (§ 15.5 General conditions of operation, subpart (c)) been acted upon by the utility.

The conclusion of this report is that based on the continuing severe BPL interference to licensed Amateur Radio stations including WØSR, BPL systems of this type are not practical in the MF and HF regions, especially where they are co-located in near proximity to licensed users of the spectrum.

Geographic implications of widespread BPL implementation

Attached to this reply is a map showing the locations of the mailing addresses of licensed Amateur Radio operators in the northeast quadrant of Cedar Rapids, and in Hiawatha, both in Iowa (source: www.QRZ.com for only zip codes 52402 and 52233). In most cases, it indicates the location of fixed Amateur Radio stations. It does not, of course, show the areas of operation of mobile Amateur Radio stations, which operate throughout the mapped area.

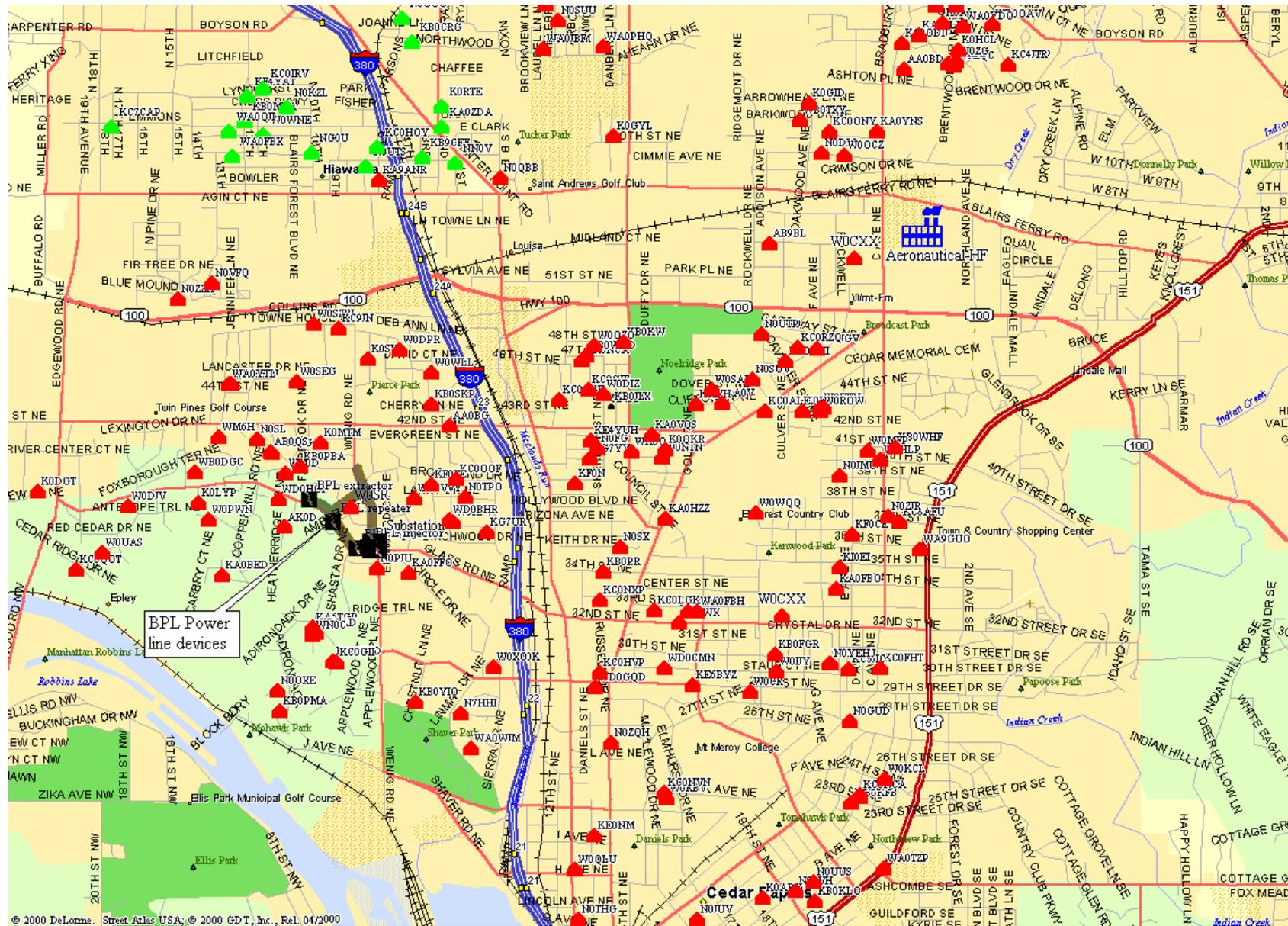
If a fully deployed BPL system were to be implemented in the Cedar Rapids metropolitan area, each one of those indicated locations also shows where harmful interference to the licensed Amateur Radio frequency bands must be eliminated.

The BPL trial system in Cedar Rapids is identified on the map. The failure to eliminate harmful interference generated by this relatively small BPL test system to several Amateur Radio stations (including WØSR) indicates that successfully deploying a BPL system in the entire Cedar Rapids metropolitan area will be a formidable, if not impossible, task.

Yours truly,

Alan Erickson
Amateur Radio Station WBØOAV
6722 Kent Dr NE
Cedar Rapids, IA 52402
WBØOAV@arrl.net

Encl.



© 2000 DeLorme, Street Atlas USA, © 2000 GDT, Inc., Rel. 04/2000
 Amateur Radio licensed locations in Cedar Rapids Ia Zip code 52402 (North of highway 151 and the Cedar River, in Red) and Hiawatha zip code 52233 (green). North is the top of the map.