

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Carrier Current Systems, including Broadband over Power Lines Systems)	ET Docket No. 03-104
)	
Amendment of Part 15 regarding new requirements and measurement guidelines for Access Broadband over Power Line Systems)	ET Docket No. 04-37
)	

REPLY COMMENTS OF VERIZON

The deployment of Broadband over Power Lines (“BPL”) will provide yet another facilities-based broadband platform, but such deployment will be undercut if the new service interferes with other telecommunications and broadband services. To avoid such problems, the Commission should follow through on its proposal to establish a database, similar to the existing database for Power Line Carrier Systems. Several commenters have expressed concern that a public database could reveal competitively sensitive information or jeopardize the security of their networks. Verizon is sympathetic to these concerns and would not oppose establishing a database that is maintained by and accessed through an administrator, so long as it was effective at allowing parties to sufficiently identify and resolve issues of potential interference.

Whether administered by the FCC or by a third party, any access to the information in a database should be sufficient to allow a company such as Verizon to indicate that its customer(s) experienced interference at a specific location, and obtain basic information about the BPL providers in the area. The database administrator should be able to identify operators of BPL

systems in the vicinity (without disclosing the affected customer location) and provide contact information for those operators along with basic operating information about their BPL systems, such as the frequencies they use. Verizon could then attempt to contact those BPL operators and resolve the interference issue. If Verizon could not reach the BPL operators or was otherwise unable to resolve the interference with the information provided by the database administrator, Verizon could again contact the administrator for further assistance in identifying the BPL system causing interference. This arrangement would protect the confidentiality of the affected parties' competitive and network security information.

The Commission should not, however, abandon its database proposal or impose more onerous restrictions on the use of the database. Doing so would undercut the Commission's objective "to ensure that the location of Access BPL systems and their operating characteristics are identified if harmful interference occurs and to facilitate interference mitigation and avoidance measures."¹

For example, Duke Energy recommends that the national database "only be made available to licensed radio operators or other qualified entities (such as state or federal agencies)" Duke Energy Comments at 10. The Commission should not preclude companies like Verizon from obtaining information about potentially interfering BPL systems in a central BPL database. As Verizon explained in its comments, BPL may potentially interfere with voice and DSL services. Verizon Comments at 2-3. When Verizon's customers experience harmful interference, Verizon needs to be able to locate and identify the source of that interference so that the affected parties can work to resolve the problem through implementation

¹ *Carrier Current Systems, including Broadband over Power Lines Systems*, Notice of Proposed Rulemaking, 19 FCC Rcd 3335, ¶ 43 (2004).

of the avoidance and mitigation technologies required by the Commission's proposed rules. If companies like Verizon are not able to adequately obtain the information they need from a centralized database in a timely manner, they will not be able to address and resolve interference issues with BPL operators when they arise and the purpose of the database will not be met.

Conclusion

The Commission should encourage the deployment of BPL systems along with other broadband technologies and services, while ensuring that BPL systems do not interfere with other telecommunications services.

Respectfully submitted,



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