

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

In the Matter of)	
)	
Carrier Current Systems, including)	ET Docket No. 03-104
Broadband over Power Line Systems)	
)	ET Docket No. 04-37
Amendment of Part 15 Regarding New)	
Requirements and Measurement)	
Guidelines for Access Broadband over)	
Power Lines Systems)	

COMMENTS OF THE UNITED POWER LINE COUNCIL

Pursuant to Section 1.415 of the Federal Communications Commission (“FCC”) Rules, the United Power Line Council (“UPLC”) hereby submits its comments in response to the Commission’s Public Notice in the above-referenced proceeding.¹ The UPLC urges the FCC to recognize the United Telecom Council (“UTC”) as the Access BPL database manager, because UTC would effectively implement and manage the database, thereby promoting the deployment of BPL and the resolution of potential interference from BPL operations.

Introduction

The UPLC is an alliance of utilities and their technology partners that are developing BPL in America. Its mission is to drive the

¹ *OET Seeks Comment on Proposal by United Telecom Council to Serve as Database Manager for Access Broadband over Power Line Systems*, ET Docket No. 04-37 Public Notice, 2005 WL 1364529 (“Public Notice”).

development of business, technical and regulatory solutions for BPL in a manner that enables all its members to succeed. The UPLC was created in recognition that significant trials are underway in various parts of North and South America. It was formed by the United Telecom Council (UTC) as a separate organization to carry on and expand on the efforts of the UTC's Power Line Telecommunications Forum (UTC PLTF) that has been the primary resource for advocacy and information on BPL in North America since 1998. Virtually every utility and technology company that is either interested in or actively deploying BPL in the U.S. is a member of the UPLC.² As such, the interests of the UPLC would be significantly affected by the issue of the establishment and management of the Access BPL database.

- I. **UTC is qualified to serve as the Access BPL Database Manager.**

² The members of the UPLC are listed on the UPLC website at www.uplc.org.

UPLC believes that the UTC is qualified to serve as the Access BPL database manager. UTC has managed a similar database used to coordinate power line carrier systems with Federal government operations for decades. Furthermore, it has designed and beta-tested a BPL database that would be easy to use for BPL operators and would provide effective public notice to facilitate the resolution of any potential harmful interference from local BPL operations. Therefore, FCC recognition of UTC as the database manager will speed the establishment of the database and provide for its continued effective management.

II. UTC is well-positioned to serve as the Access BPL database manager.

UTC is also well-positioned to serve as the Access BPL database manager. It represents the telecommunications and information technology interests of all types of utilities, including municipal utilities. Through the UPLC, which represents the BPL industry, UTC also knows the latest developments and companies that are deploying in the U.S. It has worked closely with the FCC and NTIA on a variety of matters including BPL, and it is engaged with organizations representing the interests of licensed radio users in the HF band. In fact, many of UTC utility members hold licenses to operate in the HF band. As such, UTC is uniquely positioned to serve as the Access BPL database manager.

The FCC has declined to require that the database manager be an independent third party with no relationship to the BPL or utility industry. “The responsibilities and duties of the database manager are to maintain

complete, accurate and timely records of FCC-mandated information,” and it is not required to “be involved in, monitor, or manage the interference resolution process.”³ UPLC agrees with the FCC and fully expects that UTC’s relationship with the utility and BPL industry would enhance its ability to carry out its administrative responsibilities as the database manager.

WHEREFORE, THE PREMISES CONSIDERED, UPLC is pleased to provide its comments supporting UTC to serve as the Access BPL database manager.

Respectfully submitted,

UPLC

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³ *Carrier Current Systems, including Broadband over Power Line Systems*, Report and Order, ET Docket No. 04-37, 19 F.C.C.R. 21,265 at ¶84 (“*Report and Order*”).