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Docket No. FCC-2009-0246
Federal Register Number E9-20336
Broadband over Power Line Systems
Federal Communications Commission

On behalf of Ingersoll Rand, I am pleased to submit the following comments on the above-referenced subject.

Ingersoll Rand is a global diversified industrial firm providing products, services and solutions to enhance the quality and comfort of air in homes and buildings, transport and protect food and perishables, secure homes and commercial properties, and enhance industrial productivity and efficiency. Driven by a 100-year-old tradition of technological innovation, we enable companies and their customers to create progress. For more information, visit www.ingersollrand.com.

I wish to express Ingersoll Rand's substantial concern over the potential rule changes by the FCC, as delineated in document FCC 04-245. More specifically, the following items are the focus of our concern:

1. Amendment of Part 15 regarding new requirements and measurement guidelines for Access Broadband over Power Line Systems: ET Docket No. 04-37
2. Carrier Current Systems, including Broadband over Power Line Systems ET Docket No. 03-104

Ingersoll Rand is in the business of manufacturing and selling physical access control readers for commercial, institutional and governmental occupancies. These readers work on the principle of inductive coupling between a powered reader device emitting an AC magnetic field and a passive transponder that is powered by the reader device and then transmits data to the reader device. These devices are governed by and comply with current FCC rules.

FCC rules currently allow a 40 dB per decade extrapolation to be used when our equipment is tested over a ground plane, and extrapolation to a larger test distance is then performed. This is a longstanding practice and has been demonstrated to be accurate and appropriate. Should the FCC adopt a 20dB or 30dB standard extrapolation factor, or abolish the two point measurement of the fall off, most if not all physical security products governed by these standards would be harmed. Keeping the existing rules is absolutely essential for uninterrupted commerce in all sectors of this critical industry.

As a proposed solution to the issue at hand, we believe that any modifications to the BPL measurement rules can and should be addressed under the BPL rules, namely Part 15 Subpart G. The existing 40dB per decade rule is under part 15 Subpart A which applies to ALL part 15 devices. Since the Access BPL devices are a “unique” transmitter type, we propose the FCC leave any modifications to the testing procedures under that specific section.

We submit that the proposed changes could jeopardize the physical security industry in the United States, an industry which generates upward of \$500 million dollars annually. Based on the facts put forth in this letter, we respectfully request that any rule making occurring under 15A are specific to BPL systems.

We thank the Commission for providing the opportunity to comment, and we look forward to your response on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kurt Roeper', written in a cursive style.

Kurt Roeper
Director – Codes & Standards
Ingersoll Rand Security Technologies