

I wish to thank the Commission for the opportunity to comment.

I have significant concerns over the allowance of BPL without ensuring that the effect on shortwave communications will be negligible. Particularly troubling is the refusal of the Commission to allow adequate time for evaluation of the NTIA technical study and the perceived refusal of the FCC to consider that BPL may not be the panacea that proponents advertise.

I urge the Commission to adequately evaluate the potential for interference to other services, including amateur radio and international shortwave broadcasts. In addition, in the event that the warnings of interference do indeed materialize, as evidenced by reports from test areas, the Commission must put into place a system to allow for 1) rapid solution of interference problems, 2) public disclosure of interference and solutions found to the interference, and 3) a requirement that unwitting consumers are advised beforehand that there is no guarantee regarding interference to their broadband access under Part 15 rules. In addition, it must be ensured that the BPL operators are not the ones who decide whether interference is acceptable. It is incumbent upon the Commission to ensure that adequate resources are also available to handle complaints and violations of the Part 15 rules that will undoubtedly take place in the event of widespread deployment. The Commission should also require that a base line interference survey be conducted by a qualified, independent entity prior to allowing the deployment of BPL in any area. This will dispell conjectures as to whether or not BPL has indeed had an adverse affect in the deployment areas.

In my opinion the Commission has rushed into the entire issue of BPL without adequately considering all of the implications and without adequate controlled testing. Although BPL certainly appears to be a politically motivated effort, rather than a viable technology, one can only hope that in the final analysis the Commission represents the American people, rather than special interest groups.

Thank you for considering my comments.

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