

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Carrier Current Systems, including Broadband over Power Line 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
)	
To the Commission:)	

Via the ECFS

REPLY COMMENTS OF IEEE 802.18

IEEE 802.18¹ hereby respectfully offers its Reply Comments in the above-captioned Proceeding (the “NPRM”).²

The members of the IEEE 802.18 that participate in the IEEE 802 standards process are interested parties in this proceeding. IEEE 802, as a leading consensus-based industry standards body, produces standards for wireless networking devices, including wireless local area networks (“WLANs”), wireless personal area networks (“WPANs”), and wireless metropolitan area networks (“Wireless MANs”). This document was also reviewed and approved unanimously by the IEEE 802.11 and 802.15 Working Groups

IEEE 802.18, 802.11, and 802.15 are interested parties in this Proceeding and we appreciate the opportunity to provide these reply comments to the Commission.

¹ The Radio Regulatory Technical Advisory Group (“RR-TAG”) within the IEEE 802 Local and Metropolitan Area Networks Standards Committee (“IEEE 802” or the “LMSC”)

² This document solely represents the views of IEEE 802.18, 802.11, and 802.15 and does not necessarily represent a position of either the IEEE or the IEEE Standards Association..

INTRODUCTION

1. IEEE 802.18, 802.11, and 802.15 note the timely-filed comments of IEEE-USA in the instant Proceeding and fully concurs with and supports them.
2. We therefore join IEEE-USA in strongly urging the Commission to approach this matter with a more cautious and measured approach.

DISCUSSION OF THE MAJOR ISSUES

3. We share the concerns expressed by IEEE-USA regarding the ability of Access BPL technologies to adequately protect the many and varied licensed users of the high frequency (“HF”) spectrum – *including many uses that are critical to national security, homeland defense, and emergency and disaster communications* – from serious and widespread harmful interference.
4. We also share the concerns expressed by IEEE-USA that Access BPL systems operating in the HF spectrum will also be subject to interference *from* the licensed users of the HF spectrum, potentially rendering the solution a less reliable means of delivering the quality of broadband service than the American public both deserves and will increasingly demand.
5. We concur with IEEE-USA’s observation that the existing radiated emission limits in the Commission’s rules for this portion of the spectrum were developed many years ago, taking into consideration a limited number of localized point source radiators, *not in taking into account systems such as Access BPL that are intended to employ what are, in fact, geographically widespread distributed antenna systems that radiate at the prescribed levels virtually everywhere they exist.*

6. Thus, the current limits are, in our opinion, *when applied to Access BPL*, inadequate to afford the necessary level of protection to licensed uses of the HF spectrum and we share IEEE-USA's concerns that if Access BPL were deployed widely, it would pose an unacceptable risk of seriously disrupting those many critical services that can only be accommodated in the HF spectrum because of the unique propagation characteristics of that portion of the spectrum.

7. We believe that the current (and growing) body of technical evidence supports the conclusion that the Commission's radiated emissions limits applicable to Access BPL under the current rules need to be modified to significantly reduce the levels of radiated emissions that would be permitted from Access BPL systems (*if such systems are permitted to be deployed at all – something that we are not convinced would be in the public interest in the first place*).

8. However, we believe that such changes should, in clear recognition that Access BPL is “a very different animal” than “normal” Part 15 devices and systems, be enacted in a separate, new section of Part 15 that applies specifically to Access BPL, rather than through a general modification of the current general radiated emissions limits of Part 15.209 of the Commission's rules. These limits have worked, and continue to work, quite well in protecting licensed services from harmful interference while not imposing onerous requirements on “normal” Part 15 devices.

9. Finally, we are also disappointed that the Commission, despite requests from Members of Congress and interested parties, chose to proceed with this NPRM before the release of a report from NTIA on the results of a rather extensive program of field measurements they have been conducting regarding the interference potential of Access BPL. We also believe that the information contained in this report would have, *had it been available sufficiently before the comment deadline in this Proceeding to permit a thorough review and analysis of its contents*, been a valuable resource for the public in the formulation of its comments.

SUMMARY AND CONCLUSION

10. To reiterate, we note the timely-filed comments of IEEE-USA in the instant Proceeding and fully concur with and support them.
11. We therefore join IEEE-USA in strongly urging the Commission to approach this matter with a more cautious and measured approach.
12. We see no need for the Commission to rush to judgment in this Proceeding in light of the growing body of evidence that “Access BPL” will present serious interference problems to the many important and varied users of the HF and low VHF spectrum.

Respectfully submitted,

/s/

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