

EXHIBIT C

ARRL PETITION FOR RECONSIDERATION

NTIA EVIDENCE THAT INTERFERENCE FROM BPL IS NOT LOCALIZED

NTIA's letter of September 13, 2004, cited in the R&O, includes charts at pages 9 through 11, some of which are reproduced below. The charts, which ARRL did not have the opportunity to address in this proceeding because they were filed considerably after the comment and reply comment dates in the proceeding, demonstrate that the probability of harmful interference at 4 MHz from BPL operation is essentially 100 percent at distances up to 200 meters from a BPL-carrying power line, increasing to 200 meters at 20 MHz. The definition of harmful interference utilized in this NTIA analysis is premised on a 1 dB increase in noise. There are Amateur HF allocations at 3.5, 5, 7, 10 and 14 MHz, which are extremely heavily used, day and night, 24 hours per day, 7 days per week, 52 weeks per year. These interference contours are devastating to Amateur Radio communications.

NTIA, at Section 6 (pages 6-1 through 6-4 of the NTIA Phase 1 Report) provides an explanation of $(I+N)/N$. On page 6-3, NTIA states: "For most frequency sharing situations, it is well-established in international and domestic spectrum management practices to generally limit interfering signal levels in a manner that preserves good control over radio system performance by designers and operators (*e.g.* $(I+N)/N=0.5$ or 1 dB)."

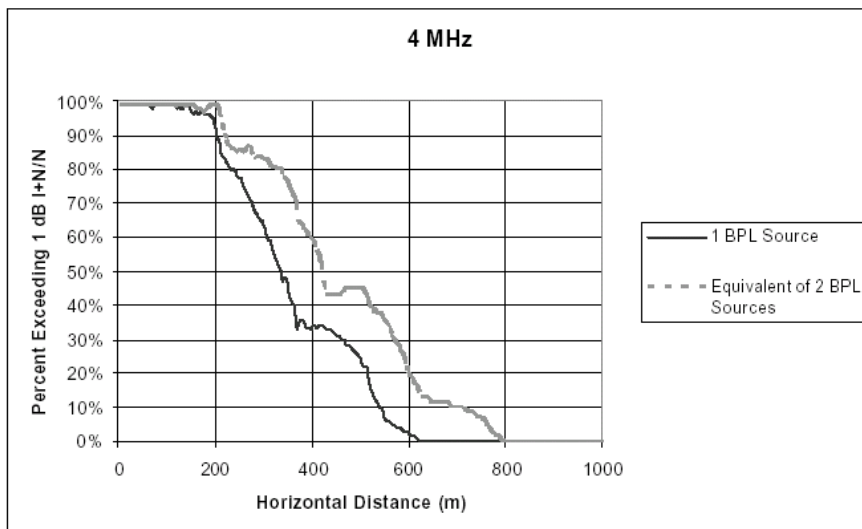


Figure 1 – Exclusion zone / coordination area radii for 4 MHz and 0 dBi receiver antenna gain toward the power line

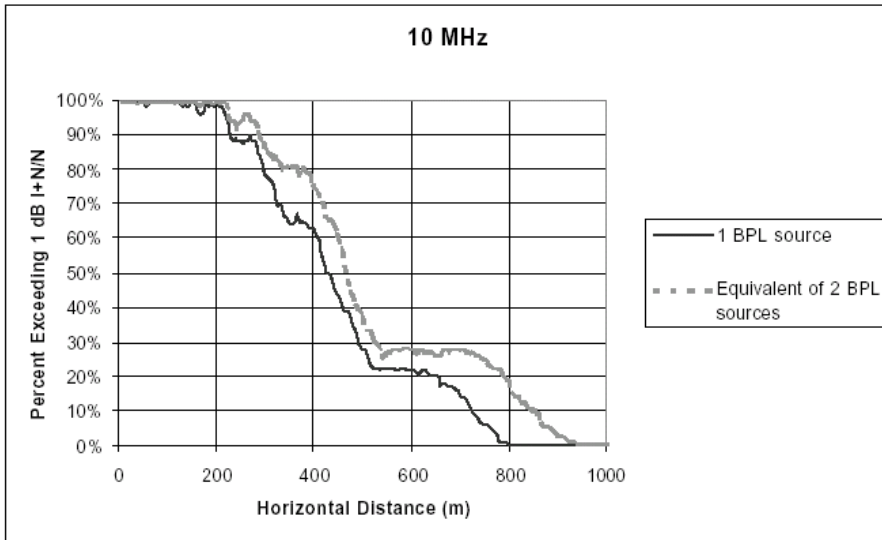


Figure 2 – Exclusion zone / coordination area radii for 10 MHz and 0 dBi receiver antenna gain toward the power line

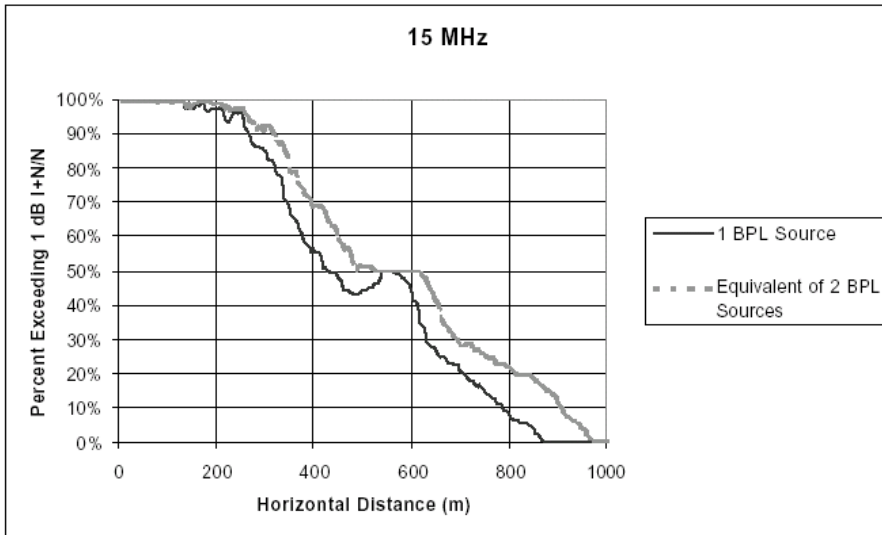


Figure 3 – Exclusion zone / coordination area radii for 15 MHz and 0 dBi receiver antenna gain toward the power line

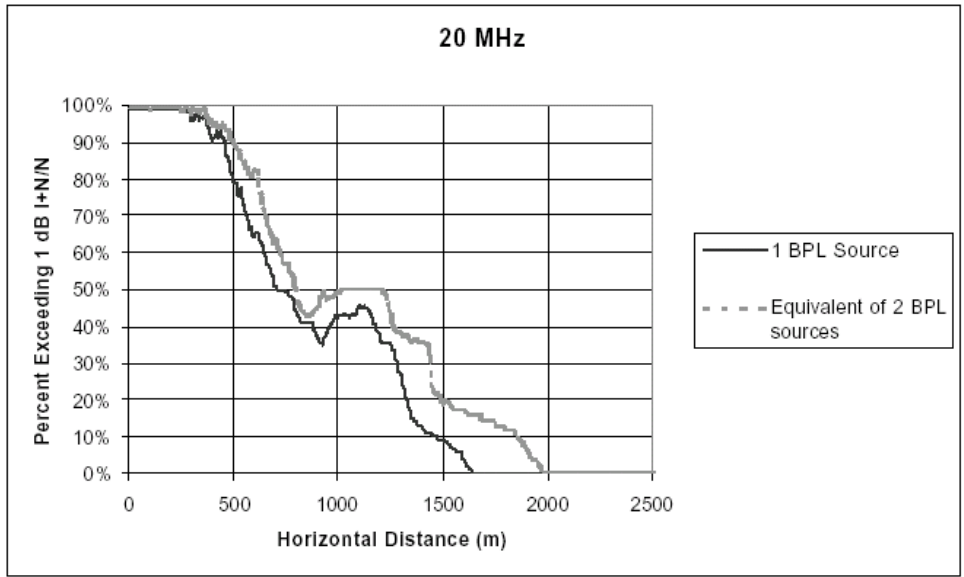


Figure 4 – Exclusion zone / coordination area radii for 20 MHz and 0 dBi receiver antenna gain toward the power line