

Now the Commission appears to wish to support the application of PLT technology to in-house devices. These do nothing to bring broadband to the end-user, but are simply a means of distributing broadband around the home (and there are alternative, non-polluting, technologies available for this)

The progressive erosion of the value of the radio spectrum seems a high price to pay for favouring such a technology, which has no merit in market penetration terms.

I should be grateful if you could let me know the reasons for the EC taking this stance, when:

- a) It is favouring one specific technology and cannot be argued to be technology neutral.
- b) Simply because one technology cannot meet emissions standards that have served us well for years, provides no reason to relax those standards
- c) There is little public benefit from the technology (given there are alternatives)
- d) Once the standard is relaxed, there will be other technologies which will claim that the PLT standard relaxation should apply to them, and then the whole equilibrium of radio service protection will be consigned to history.
- e) The recent independent report commissioned by UK's Ofcom has confirmed high risk of significant interference to authorised radio services from the continuing deployment of PLT devices.

The Commission is taking a very grave step here, one which sacrifices the radio spectrum to nothing more than consumerism. It is a step which the Radio Society of Great Britain is determined to challenge.

Please would you let me have your reasons for taking this stance, which to some appears little short of technological vandalism.

Yours sincerely,



Donald F Beattie
Technical Director



EUROPEAN COMMISSION
ENTERPRISE AND INDUSTRY DIRECTORATE-GENERAL

New Approach Industries, Tourism and CSR
Director

Brussels,
ENTRI4/OP/rpv/ares (2010) 605541

Mr. Donald F Beattie
Technical Director
Radio Society of Great Britain
(to be sent by e-mail)

Dear Mr. Beattie,

Thank you for your letter of 28 June 2010 concerning PLA/PLT Device Policy and the mandate the Commission has sent to CEN-CENELEC to work on an amendment to standard EN55022 in relation to PLT.

The European Commission services have mandated CEN against the background that potential interference incidents may arise from a lack of information concerning the specific needs of small signal radio services at the manufacturing companies and commercial agents. The mandate includes the request to produce appropriate standards containing mitigation measures, e.g. power management and frequency notching especially.

European market surveillance authorities have repeatedly stated the urgent need for a standard for this kind of appliances that are currently being widely deployed in Europe. The Commission responded to this by supporting European Standards Organizations to concentrate all their efforts to find a suitable solution for PLT devices in the form of a harmonised EMC product standard while keeping as a priority the protection of the existing radio services. As you probably are aware, the Radio Society of Great Britain is well represented in the Working Group charged with working on the standard and I am certain that the resulting standard will reach a very good equilibrium of radio service protection.

We believe that this harmonised standard shall contribute to the elimination of any possibility of interference by providing a clear understanding of the path to follow for compliance with the EMC Directive.

As regards your general concern expressed on PLT technology, I can ensure you that the Commission is aware of interference problems that occur and we do not by any means intend to legitimise any level of interference. However, we do not have the evidence that these cases would justify a ban on an entire technology. Acting in this way would abandon technological neutrality and would be a very disproportionate response especially given the fact that mitigation techniques exist and have proven to be effective.

In your letter when you refer to the PLT technology you mention that "There is little public benefit from the technology" and that it "has no merit in market penetration terms". According to the numbers published by OFCOM "there are now an estimated 1.8 million pairs of PLT apparatus in use in the UK". This seems to us sufficient grounds to consider this a technology with an established presence in the market. Moreover, technological advances are often successful because of being both convenient for public use and commercially successful.

European Union legislation and in particular Directive 2004/108/EC on electromagnetic compatibility provide national authorities with the necessary means in order to enforce the essential requirements contained in the Directive. In the case of PLT/PLC technologies this applies to any kind of equipment, this is to say both apparatus (in-home PLT) and fixed installations (access PLT).

The Commission has been informed that the complaints against the use of PLT devices were examined by the UK authorities and where the interference was created by their use this was addressed by adequate local means and solutions.

OFCOM's study analysing the impact of PLT/PLC technologies shows that, even if PLT technology has a potential to cause interference, this can be limited provided that the adequate mitigation measures are used.

I trust that this information proves helpful.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Pedro Ortún', written over a large, faint, stylized graphic element that resembles a wide, shallow bowl or a stylized letter 'P'.

Pedro ORTÚN