

RADIO SOCIETY OF GREAT BRITAIN

Response to ETSI TS 102578: 'PowerLine Telecommunications (PLT); Coexistence between PLT Modems and fixed SW Radio broadcasting services.'

In consideration of this draft the RSGB would like to make the following points:

1. We note that the draft does not offer any protection to the Broadcasting Service beyond that to which they are already entitled to under EN55022;
2. We note that outside the Broadcast Bands the draft proposes that the emissions from the PLT system will be allowed to rise above EN55022 levels;
3. The introduction in the draft states that PLT systems cause interference. The authors need to be reminded that the ITU Radio Regulations, the EMC Directive and, interestingly enough, the Human Rights Directive, all require in differing ways that radio services are protected from interference and shall be able to operate as intended.
4. EN55022 remains and must be complied with inside and OUTSIDE the notches.

In the scope it is stated that the Amateur Radio Service “might” be included in the notching. However, because the Amateur Radio Service, unlike the Broadcast Service, often operates with S/S+N ratios close to the noise floor as defined in the ITU Radio Regulations, the smart notching would generally not be triggered because of the 10dB S/S+N threshold proposed and the fact that the noise level that the PLT system would see would likely be much higher than the ITU Radio Regulations defined noise level (being inside a house, etc). Thus, we strongly assert that permanent notching across the bands allocated to the Amateur Radio Service will be essential to minimise interference from the proposed PLT usage.

John Gould, G3WKL
RSGB HF Manager

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