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The President of the European Commission  
José Manuel Barroso

B-1049 Bruxelles

Mönchengladbach, 5. August 2005

Dear President Barroso,

## **Powerline Communications: Questions and Answers – Memo/05/119**

Over the past two years we have written to the European Commission on several occasions in relation to its campaign for the wide-scale introduction of powerline communication technology.

In our most recent letter dated 23 June 2004 we again objected to the Commission's practice of making unproven claims regarding PLC's utility, advances in its capabilities through ongoing technical evolution, its alleged similarity with other wire bound broadband technologies and its economic and social significance. Most importantly, we objected to the Commission's dismissive stance regarding the technology's potential to cause serious and unlawful interference to radio services. In taking issue with these points we advocated greater truthfulness on the part of the Commission in undertaking its pro-PLC activities.

We hoped that the Commission would at some stage recognise the need to respond constructively to the concerns raised in our letters which are, as you know, widely shared by many engineers and scientists concerned with radio communications and the preservation of electromagnetic compatibility between different technologies. Regrettably, a credible response has not yet come forth. We had also expected the Commission in its further pronouncements on PLC to at least acknowledge the growing evidence of the interference potential of PLC systems that continues to arise from trials and commercial operations around the world. This is irrefutable proof that, contrary to the irresponsible claims by its proponents, even the most technically 'advanced' PLC systems available today remain a major threat to radio communication well beyond the HF spectrum. Although we have no interest either way in the prospective economic performance of PLC services, we would point out that the manifest interference problems continue to be one of the key issues overshadowing commercial viability of PLC systems. The Commission and national administrations are not really doing the industry any favours by not offering an environment where the likelihood of harmful interference is low.

It is most regrettable that the Commission in its press release continues to try to create the impression that trials and commercial PLC operations around the world are proceeding smoothly and without causing any interference. This is far from the case, and by hiding the EMC issues that have been manifest in these operations the Commission is leading the industry, investors and electric utility companies down a path that is not likely to achieve the designated aim in the long run. Other successful industries, such as cable and DSL, have thrived because they were given regulations that ensured their reasonable compatibility with radiocommunications services.

Notwithstanding the fact that we, as already stated, have no vested interest in the economics of PLC, we are also concerned at the suggestion that material and growing market penetration of PLC provides a robust basis for meaningful broadband business activity which ostensibly justifies certain compromises to the detriment of radio users in order to advantage PLC – the so-called 'Level Playing Field'.

Has it really escaped the Commission's attention that PLC operations in Linz (Austria), Mannheim and Haßfurt (both in Germany) have run into major regulatory problems because of radio interference caused by them? Is the Commission really ignorant of the fact that yet another utility, SSE Telecom, has announced its withdrawal from the PLC adventure for technical and economic reasons? Does the Commission not know that many interference cases have arisen from PLC trials in the US which, contrary to your claim that newer PLC systems possess improved interference abatement capability, could not be satisfactorily corrected short of shutting the systems down. Contrary to the claims made by the PLC industry in the US press, interference is ongoing in Manassas, VA and at other PLC sites, including recent installations in Houston, TX and Shelton, CT. In fact, one PLC technology provider implicated in at least one major PLC trial in the US has been the subject of a very critical technical assessment by the UK Office of Communication. Is the Commission also unaware that significant radio interference is reported to be caused by three PLC systems in Spain?

One oversight of such a prominent case would be entirely excusable and could perhaps be attributable to a lack of diligence on the part of the Commission staff responsible for monitoring developments. However, to consistently ignore, misrepresent or deny these facts now leads us to conclude that this can only be deliberate policy. This appears to be in keeping with the apparent aim of the Commission to steamroller the way for wide-scale introduction of PLC against all legitimate technical concerns. Perhaps this is only because recognition is finally dawning on the Commission that as far as access PLC is concerned, its initiative will more likely than not fail, and that it is therefore now necessary to promote the inhouse networking application to show something for one's efforts. The April press release contains some instructive new language in this regard.

Against this background, and given the continual downbeat statements about the allegedly diminished utility of the HF radio spectrum, we put little store by the Commission's routine assurances of full commitment to the continued protection of radio systems. The Commission's belittling utterances on the value of the radio spectrum, suggestions that it must of necessity "yield" to the pressures and demands from the broadband so-called 'e-society' and other misleading statements are to us evidence of a remarkable degree of ignorance of the technical facts, at best. At worst, they show a reckless disregard for the needs and rights of users of the HF spectrum around the globe, particularly those in the developing world who continue to rely on it as their sole communications resource facilitating welfare and economic progress.

To try and understand our point, the Commission should perhaps lecture those people, who owe their rescue from the aftermath of the 2004 Boxing Day tsunami to the Amateur Radio Service, on the alleged uselessness of short wave radio. Post-tsunami news coverage from around the world attesting to the value of readily available, uncomplicated and reliable HF communications to aid the relief efforts makes it abundantly clear that determined attempts must be made to preserve the integrity of this invaluable resource.

The Commission must therefore stop glossing over PLC's proven severe interference potential and terminate forthwith its efforts to dilute existing legislation and standards protecting radio communication services from harmful interference to specifically enable PLC. We seek your assurances that you will take the appropriate steps to ensure that the Commission's future statements and actions in connection with its PLC crusade are fully compatible with the facts.

Yours sincerely

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