

## **RADIO SPECTRUM COMMITTEE**

### WORKING DOCUMENT

Subject: Broadband Communications Through Powerlines

#### **SUBMISSION BY IRISH RADIO TRANSMITTERS SOCIETY (IRTS)**

Document COCOM03-32 sets out a scenario where Powerlines are utilised to deliver Broadband Communications and thus circumvent the unexpected delays involved in unbundling the local loop and in building alternative methods of delivering this service.

Power companies obviously see this as another method of generating additional revenue streams utilising existing infrastructure and with relatively limited capital expenditure.

The Radio Spectrum Committee sees Broadband Communications through Powerlines as a convenient method of furthering the ten year goal set at the Lisbon European Council in 2000 for the EU to become the most competitive and dynamic knowledge-based economy in the world.

The Document rightly points to the problem of interference with existing services – notably HF Radio communication and states somewhat delicately “the further development of powerline communications remains hampered by specific concerns related to the compatibility of powerline communications networks with existing radio services, notably in the bands from 1.6 MHz up to 30 MHz”

IRTS takes the view that until this compatibility has been established to the satisfaction of those other users of the radio spectrum, no further development of powerline communications should be encouraged or permitted.

It is noted that powerline communications networks are classed as guided media and as such they are installations in the sense of the EMC Directive. It is extremely disturbing to note that harmonised standards for PLC networks have not yet converged and accordingly “regulatory uncertainty remains”. The document notes that such uncertainty “can damage the interests of an emerging industry etc.” The IRTS takes the contrary view that such uncertainty can seriously damage the interests of the existing spectrum users.

The Working Paper refers to “creating a favourable regulatory environment to enable new solutions for broadband communications” and then proceeds to promote PLC as the single method of introducing competition in the local loop. PLC has shown itself in Europe and, more recently in North America, to be a “dirty” medium – one that causes serious interference for existing users of the HF spectrum. Encouraging Member States to allow the deployment of powerline communications networks in their country could be regarded as promoting the wrong system for the wrong reasons to the wrong customers. PLC is an experimental medium still subject

to serious problems and not yet ready for general application. IRTS is of the view that it is not appropriate for the Radio Spectrum Committee to promote the general use of PLC in these circumstances. When the industry can demonstrate to all interested parties, particularly the existing users of the HF Spectrum, that this is an interference-free medium, then the Radio Spectrum Committee can feel free to promote the medium to Member States.

Dublin  
30th September 2003