

To: Bill Ray, "The Register"

Bill,

Firstly let me introduce myself I have recently taken over the Chairmanship of the RSGB EMC Committee, having been involved both in the electronics industry and as a radio amateur for many years before recently retiring. My final posting was Technical and Engineering Director of Thales Australia having been a Technical Director for Racal Defence and Thales Defence for 20 years. We would appreciate you publishing our comments below in response to the article referenced above.

-----Comments Start-----

I have just seen your report in the Register under the heading "PLT Chair: UK Radio Society is "living in a dream world"

Perhaps I may clarify a couple of points in your report.

a) The RSGB is not seeking a ban on PLT devices. We are simply arguing that any emission standard should reflect the essential requirements of the EMC Directive. The relevant clause from the EMC Directive is "Equipment shall be so designed and manufactured, having regard to the state of the art, as to ensure that.....the electromagnetic disturbance generated does not exceed the level above which radio and telecommunications equipment or other equipment cannot operate as intended"

The Commission has confirmed that EN55022 applies to PLT devices. Device manufacturers are arguing that emissions from PLT devices should be allowed at a much higher level (up to 45dB or about 50,000 times higher) than EN55022. Empirical evidence from a number of trials is that this causes interference to existing radio services.

b) The RSGB is not alone amongst national Societies in opposing the current draft proposals, and our views are shared by professional EMC consultants and other HF radio users as well.

c) The European Commission's own EMC Consultant has confirmed that in his view the proposed draft does not satisfy the Essential Requirements of the EMC Directive. Mr Storrs's assertion that there is no standard today is not the Society's understanding, not the Commissions, nor that of ECC or CEPT. It is simply that the current standard is too constraining on PLT device manufacturers.

We regret having to write publicly on this matter, as Mr Storrs has already written to the Society making a number of points. We will be replying to his letter in the next day or so. If Mr Storrs wishes to make public our reply we have no objection to it being published.

Regards

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(M0JAV & VK2JAV)
Chairman RSGB EMC Committee