

RADIO SOCIETY

of Great Britain

Simon Hicks
Head of Technology (Electronic Communications and Content)
Information Economy (IE) Directorate
Department for Business, Innovation & Skills
1 Victoria Street
London SW1H 0ET

15th October 2010

Dear Simon,

Thank you for your time yesterday – we really appreciate it.

I think the best way to describe the outcome of our meeting was that we “agreed to differ” on the significance of the threat to authorised radio communications systems from PowerLine Adaptors.

Perhaps I might just set out, for the record, the points we made in our meeting:

- 1 It is clear that the devices currently being marketed fail to meet the essential requirements of the EMCD. I say this for three reasons:
 - a. With emissions at 1,000 times the level that allows the presumption of conformity (EN55022), it beggars belief that the devices can conform
 - b. Our statistical mapping shows that the complaint numbers to date broadly align with the known market penetration of PLA devices
 - c. Our own measurements using laboratory equipment in-situ, show totally unacceptable levels of interference
- 2 The position adopted by Ofcom appears to us to be based on finding reasons not to take any action against PLA's rather than to take action, citing Europe, proportionality, public interest, costs etc etc. Counsel's advice to us is that there are plenty of sound reasons for taking action in this case. It seems that it is simply the motivation that appears to be missing.
- 3 The discussions in CENELEC WG11 seem based on a standard which requires Dynamic Notching and Dynamic Power Management. The Society is not aware of any trials of such technologies in a multi-device environment that have proven the technologies to be viable. It is also worthy of note that the proposals in WG11 allow a further increase in launch power from PLAs.
- 4 The HF spectrum represents an invaluable and irreplaceable natural resource. Once the PLA “genie” is out of the bottle, there will be no way back.



- 5 The absence of statutory powers for Ofcom to take action in cases of harmful interference is a matter of grave concern. This will become increasingly an issue as the number of OTC devices sold increases.
- 6 The question of cumulative effects is as yet unconfirmed, although recognised as a threat by PA. If/when this becomes a reality, the issue of removing hundreds of thousands of devices would represent an impossible task.
- 7 The current work in WG11 will simply enshrine the current levels of interference from PLAs – if not make them slightly worse. This cannot be consistent with the objective of the essential requirements of the EMCD. The Europe view appears to be that agreeing such a standard will resolve the current issues. This is simply not the case – although it might give the EU a more comfortable political position in terms of defending its stance on PLT.
- 8 A way ahead might be to permit PLAs to operate relatively freely in part of the 30-40 MHz spectrum, in exchange for fixed notching of the broadcast bands in the 2-30 Mhz range. 30-40 MHz is not used for long distance communication, is relatively under-utilised as we understand it, and could represent a sensible solution to the current impasse, whereby permanently notching the shortwave broadcast bands, aeronautical, standard time and frequency services would not, we understand, allow adequate spectrum for PLAs. 30-40 MHz also provides a lower-noise environment for PLAs.

Simon, I apologise for the directness of this note, but the position being adopted by Ofcom and BIS is simply not understood by those who appreciate the commodity value of the radio spectrum. It seems to us that, based on inadequate declarations of conformity, inaction by Ofcom, and enormous commercial pressures, devices are being allowed to flourish, when devices for other purposes which emit at similar levels would immediately be legislated against. We are not talking about marginal increases in noise emissions from these devices, but enormous levels of emissions compared with extant devices in other fields. It is that contrast that we find impossible to reconcile.

If nothing else, I hope you now understand the strength of our views on this matter. I hardly need to say that we will not let this rest until some common sense has come into the position.

In view of this strength of feeling amongst our members on this matter, I am sure you will understand that we will be placing this letter on our website.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. F. Beattie', with a stylized flourish above the name.

Donald F Beattie

Technical Director (Environmental)