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European Commission  
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This paper may be copied, made public and submitted to all Workshop attending parties

Dear Mr. Liikanen,

with the introduction of Digital Radio Mondiale (DRM) in June 2003 we are witnessing the birth of a new mass medium. Over the coming two to five years DRM has the potential to play as important a role the internet or satellite TV do today. DRM has the potential to create significant sustainable economic value, much of which would accrue to the European economy.

However, the establishment of DRM as a new global broadcasting standard is at risk from the introduction of Powerline Technology (PLT). In its present forms PLT technologies suffer from the mayor drawback of causing potentially enormous interference to the established, legitimate users of the high frequency spectrum. PLT is wholly incompatible with the need to continue to protect, as has been done successfully in the past, the unique and invaluable natural resource "high frequency radio spectrum".

The Commission actually recognises, and has publicaly acknowledged (Mark Bogers, DG Enterprise), that PLT will interfere with high frequency radio services. But the Commission attempts to justify its introduction on the basis that it is necessary to promote competition and that it will only be needed for a "limited" period of some ten years. Such statements are either misleading or designed to placate the critics of PLT.

There are multitude of established and emerging technologies to enable healthy competition in an already crowded market and the implied economic value of PLT is highly questionable and most certainly insufficient to justify sacrificing the HF-spectrum. The UMTS fiasco has amply demonstrated the need to exercise much greater caution in evaluating the perceived economic benefit of new technologies in order to avoid the economic pitfalls of ill considered schemes.

In stating that PLT will only be necessary for a limited period, the Commission claims that the temporary disruption to high frequency radio services will outweigh the economic benefit and that, in any event, the status quo ante will be restored once PLT is taken out of service at the end of its "useful" life. This is a totally absurd assumption. There are numerous historic examples for the long term persistence of "short term" solutions.

We urgently ask the Commission to address these issues much more carefully than appears to have been done to date. We strongly encourage the Commission to only allow those technologies access to the market place that are technically, socially and economically viable in the longer term. We remind the Commission of its responsibility to do everything necessary to continue to protect the high frequency spectrum fully in line with existing regulations and international conventions.

ADDX would like to propose the following minimal requirements, which should be met with, to guarantee from our point of view a functioning radio service on frequencies below 30 MHz as guaranteed by The European Convention of Human Rights (Preamble, Art. 19, Art. 17), the European Sustainable Development Strategy and the Consolidated EC Treaty (Art. 6) in particular or in general.

1) A new EU-directive should incorporate an exact definition of what is a wanted and what is an unwanted signal radiated on frequencies below 30 MHz. In our view those signals used by mass media such as short wave broadcasters, and those used by other important services (radio amateurs, military or NGOs with their emergency services) clearly fall under the category of "wanted signals", whereas everything (!) else which distorts or harms those signals should be defined as "unwanted signals".

2) Considering any type of radiated interferences potentially harmful to wanted reception of signals by radio we strongly recommend that the new EU directive should well distinguish between two kinds of unintentionally radiated interferences, bearing in mind the possible actions available to solve conflicts with the legally operating radio spectrum users (RFI e.g. radio interferences):

a) RFI by non-communications equipment: Any such RFI problem by these devices can be solved by applying suitable additional RFI protection such as adding filters or replacement of troublesome individual units. These unintentional radiators are characterized by the fact that the application of additional interference suppressing devices IS indeed possible and will not impair the intended operation of the devices as such.

b) RFI by wire-bound equipment for communications purposes: Any such RFI problem normally cannot be solved by additional filtering in a suitable manner as the intended purpose of these devices is to use the wire system for communications as such. Also, if networks are in operation using these devices, individual RFI protection may not be applicable without impairing the network itself. We regard it to be not avoidable to restrict any unintentional radioation by these devices to a much lower value than the devices covered by a), and we would strongly recommend that this level should be set low enough that the operation of any such equipment should go unnoticed by users of typical radio equipment being in use in the area where these wire bound devices are being put to use.

Considering that implementing maximum values for unintentionally radiated signals is a difficult task we recommend that any such level should be AS LOW AS IS CONSISTENT to go unnoticed by radio users in the same environment or they should not be allowed to be implemented. Any deviation from this goal most certainly must be regarded as an intentional infringement of the legitimate rights of radio services, especially in cases where interference solving actions are not applicable to the interfering devices as such and would impair their intended use.

Sincerely yours

Uwe Bräutigam  
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