

Please find enclosed the position of Deutsche Telekom on the issue of powerline communications, as an input for the workshop you will organise on 16 October. Our position can be summarised as follows:

Powerline communications (PLC) are promoted as a potential platform to provide high speed internet access to increase competition in this field. However, there are major concerns as regards the electromagnetic interferences created by PLC.

As a radio operator and a major promoter of the DRM standard, Deutsche Telekom shares the concerns of most radio operators about the "standards" set by Access PLC for other broadband polluters of spectrum. Access PLC will be limited to a few places because operators and investors know about the restricted performance, the limited economy and the high risk of interferences caused by PLC. We share some Commission officials' view that Access PLC will not become widespread.

Of major concern to radio operators is the deployment of "inhouse PLC".

The deployment of millions of inhouse PLC modems throughout Europe is a nightmare to any radio operator and to administrations which will have to solve numerous cases of interference. We have measured inhouse PLC modems: interference fieldstrengths up to "NB30 plus 30/40 dB", with the capability of jamming all radio reception in the frequency band between 2 and 30 MHz (sometimes with "notches" to protect some amateur bands, but no protection/notches for the broadcasting bands); the jamming range is estimated about 100 meters.

The discussion about PLC would lose much of the emotions involved if inhouse PLC modems could be adjusted to the use of radio receivers in a home environment by not using (notching) these frequencies. As a consequence much trouble could be avoided for all parties involved.

In general Deutsche Telekom is of the opinion that the benefit for European economy and society derived from the implementation of the new DRM-technology for broadcasting by far exceeds the limited benefit of legalising a polluting technology like PLC.

Two documents are annexed as input of Deutsche Telekom to the PLC-workshop:

1. Compatibility of PLC-technology and radio services; "mitigated PLC" to obtain some coexistence with radio services
2. Presentation "Radio Services using the Long-, Medium- and Short wave spectrum (9kHz to 30 MHz)" describing radio services as well as the unique propagation conditions of the frequency range below 30 MHz

Best regards
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