



EUROPEAN BROADCASTING UNION

UNION EUROPEENNE DE RADIO TELEVISION

*Technical Department*

*Département Technique*

29 September 2003

**Subject: PLT interference**

Dear Sir,

The European Broadcasting Union understands that the current (June 2003) JWG ETSI/CENELEC proposal for an emission limit for telecommunication networks operating in the LF, MF and HF frequency range, is 55.5 dB ( $\mu\text{V}/\text{m}$ ) quasi-peak in 9 kHz measured at 3 m, independent of frequency.

It is clear that radio receivers used indoors will always be within 3 m of networks serving houses and apartment complexes and often of necessity much nearer.

Our understanding is that Article 4 of the EMC Directive states that electromagnetic disturbances should not exceed a level allowing radio and telecommunication equipment to operate as intended.

We are puzzled as to how the relevant limit being considered by the JWG can possibly protect broadcasting reception which itself is based on minimum field strength values of 40, 60, and 66 dB ( $\mu\text{V}/\text{m}$ ) for the HF, MF, LF bands respectively, especially taking into account the need of signal-to-noise ratios (S/N) up to 40 dB.

We are keen to understand the basis of this proposed limit, particularly in view of the recent launch of the new digital radio service (DRM). This system has been developed for the LF, MF and HF broadcasting bands making use of new technology to provide services to the existing *hundreds of millions* of listeners.

In short, we would kindly ask you to explain to us how the limits being proposed by your JWG will conform to the protection requirements of Article 4 of the EMC Directive in relation to reception of broadcasting.

Annexed is an EBU report on the "**Impact on broadcasting of various emission limits for DSL/PLT**" for more detailed information.

In anticipation of your reply,

Best regards,

A handwritten signature in black ink, reading "T. O'Leary". The signature is written in a cursive style with a large, looping 'y' at the end.

T. O'Leary