UNION OF THE ELECTRICITY INDUSTRY
eurelectric

European Commission
Mr. Thierry BRÉFORT
DG ENTERPRISE
B-1049 BRUSSELS

Brussels, 26 September 2003
Référence: 03-067

EC Workshop on Broadband PLC on 16th October, 2003

Dear Mr. Bréfort,

Electricity network operators worldwide are involved in trials with broadband powerline communication (PLC) systems or commercial roll outs of PLC based telecom services. These projects aim at providing easy and cost effective broadband internet access as well as other telecom services (e. g. VoIP) to the customers, using existing network assets.
EURELECTRIC recognises that the European Commission has identified the PLC technology as an economically viable technology, which will increase competition and information accessibility by the public.

The PLC system trial operations result in general in the following conclusions

- technical functionality is achieved. The positive results obtained in the trial experiences around the world confirm the viability of this technology.
- customers' demands are fulfilled. Customers and commercial groups (e. g. in the field of tourism) show a high degree of interest in services based on the PLC technology.
- very small number, if any, real substantiated complaints have been attributable to a PLC disturbance -- by radio amateurs or broadcasters --
- emission limitation for broadband PLC should consider economic aspects and added value

At present, development of the PLC technology and its application is suffering from regulatory uncertainties throughout Europe leading to related investment uncertainties and therefore a prosperous development of the provision of PLC based broadband services is not being allowed to enter into the market on a large scale.

In this context, EURELECTRIC supports the proposal in the Working Document "Broadband communications through powerlines" by the Radio Spectrum Committee of the European Commission, Enterprise / DG, Information Society DG (RSCOM03-12, 21 May 2003).

Boulevard de l'impératrice, 66 bte2 - B – 1000 Brussels
Tel. : + 32 2 515 10 00 - Fax. : + 32 2 515 10 10
http://www.eurelectric.org
VAT : BE 462 679 112

EURELECTRIC has recently established a Sub-Network of Experts on Broadband PLC. The expert group will work with direct participation of experts from the Powerline Utilities Alliance (PUA).

Please find attached a report on the PLC development and related problems, worked out by PUA in co-operation with the PLC Forum. The report is supported by EURELECTRIC.

Based on the analyses made within the new EURELECTRIC sub-network (measurement methods, lacking PLC specific emission limits and equal technical and regulatory framework conditions throughout Europe) it is our opinion, that the creation of such framework conditions cannot be accomplished on a standardization level only, but needs

- appropriate political decisions – concerning the position of PLC within the entire application spectrum of the related frequency bands -- and
- support for ensuring an equal treatment of the issue considering a justified share of the EMC potential throughout the Community.

We would very much appreciate the opportunity to discuss in more detail with the Commission the issues and future activities needed to take advantage of the tremendous potential for eEurope that PLC represents among other things:

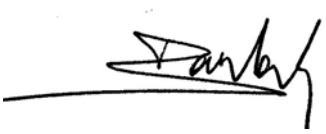
- PLC can bridge the Digital Divide and be deployed in remote rural areas and socially deprived regions
- PLC may provide the only telecoms infrastructure in some Eastern European states
- PLC can be combined with other technologies to provide or enhance service, especially last mile and in-house

EURELECTRIC believes that there are economic benefits for European citizens to make use of PLC based telecom services available at every socket outlet, and therefore

- those who wish to invest in PLC technologies should be allowed to do so without any unnecessary regulatory interference, allowing the market to function to the benefit of all stakeholders.

In case of any need for more information, please don't hesitate to contact us.

Yours sincerely



Gerhard BARTAK
Standardisation Network of Experts Co-ordinator

Paul BULTEEL
Secretary General

Attachment

Boulevard de l'impératrice, 66 bte2 - B – 1000 Brussels
Tel. : + 32 2 515 10 00 - Fax. : + 32 2 515 10 10
http://www.eurelectric.org
VAT : BE 462 679 112