

MELCARNE Fabrizio (ENTR)

From: Ulrich Onken [ulionken-2003@gmx.net]
Sent: mardi 30 septembre 2003 22:23
To: BREFORT Thierry (ENTR)
Cc: darc@darc.de; kurier@addx.de; dl1ts@darc.de; dc5jq@agz-ev.de
Subject: Comment to EU document COCOM03-32

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Document COCOM03-32

Dear Mr. Brefort,

I refer to the EU document COCOM03-32 of 3 June, 2003 and to your "Call for contributions on powerline communications" on the EU Telecoms website. You may distribute my comment to the participants of the workshop on 16 October, 2003.

I am a radio amateur (callsign DK2GO) and a regular listener of foreign radio broadcasts on the shortwave, mediumwave and longwave bands. I have studied the document COCOM03-32 and have come to the following conclusions:

1. In footnote 5 on page 8, the COCOM03-32 document recommends a maximum level of 22.5 dBmicrovolts per meter from powerline communication (PLC) signals at a measuring distance of 30 meters.
2. With a permitted field strength of PLC signals according to 1.), any amateur radio communication in the shortwave bands (1.8, 3.6, 7, 10, 14, 18, 21, 24 and 28 MHz) would become virtually impossible. Amateur radio signals are weak, due to limitations by the license authorities, permitted radiation levels in buildings and due to attenuation by the propagation path. Typical field strength of amateur radio signals are between 0 and 40 dBmicrovolts per meter. They would be wiped out in populated areas if the field strength from PLC signals could reach levels of up to 22.5 dBmicrovolts per meter.
3. With a permitted field strength of PLC signals according to 1.), most of the foreign radio broadcast transmissions between 1.6 and 30 MHz would become inaudible. This concerns shortwave radio broadcasts with typical signal levels between 10 and 60 dBmicrovolts per meter.

Shortwave broadcasts allow cross-border information to pass without influence by government authorities or by commercial communication providers. Many of these transmissions are only available on shortwave, not by satellite and not via the internet. In Germany, such interference to shortwave broadcast signals would violate my constitutional right of free access to all information sources.

4. The proposed interference level by PLC signals is so high that it would destroy any radio amateur activities between 1.6 and 30 MHz. Furthermore it would cut off significant information sources that are only available by shortwave radio broadcasts. The permitted interference level by PLC signals should therefore be at least 40 dB lower, i.e. -17 dBmicrovolts per meter or less at a 30 meter distance.

5. There are other broadband communication techniques available than powerline communication: ADSL technology, communication via TV cable, satellite communication and microwave / WLAN networks. These technologies offer similar (if not higher) bandwidths at comparable or lower prices. They do not have the significant shortcomings of the powerline technology, i.e. severe interference to existing uses of the MF and HF broadcast bands.

I ask you not to sacrifice an innovative hobby (amateur radio) and the free cross-border flow of information to the commercial interests of the powerline communication industry.

Regards,
Ulrich Onken