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European Commission  
DG Enterprise  
Attn.  
Mr. Thierry Bréfort  
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## PER E-MAIL

Ihr Zeichen	Ihre Nachricht vom	Unser Zeichen	Sachbearbeiter, DW	Vienna, 25 Sep 2003
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**EC Workshop on Broadband PLC  
16 October 2003, Brussels  
Austrian network operators' view**

Dear Mr. Bréfort,

may we kindly thank for the invitation to submit a written contribution to the forthcoming EC workshop on broadband powerline communication, from the Austrian network operator's point of view.

Aiming at providing telecom services via the electricity supply network for residents in towns and in rural areas, like broadband access to internet based services, Austrian network operators are very interested in the technology of broadband power line communication (PLT); that in conformity with the ongoing striving of the Commission for an increase of competition in the telecom market.

Quite a number of Austrian network operators have performed related field trials; at present some four utilities are dealing with such PLT services, a part of them in the manner of a commercial roll out, in low as well as in medium voltage distribution networks. Please find attached some reports of Austrian network operators, from which the present state of PLT activities in Austria may be easily recognized.

A number of Austrian network operators having had performed related field trials have dropped their PLT projects in the meantime. Other Austrian electricity companies would be interested in offering PLT based telecom services but renounce of related activities.

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This situation appears to be caused by the lack of regulatory certainty, accompanied by an inhomogeneous handling of PLT by the Authorities throughout the Community. The – still -- existing uncertainty for related investment is based on the facts that

- after some four years of thorough discussions in Standardization Bodies, there still does not exist any stable standard specifically dedicated to emission limitation for PLT
- the only harmonised standard which – in the absence of a dedicated PLT standard – is getting applied as a measure for conformity with the EMC Directive is EN 55022; a standard whose limits in the recently specified form represent a barrier to economic operation of broadband PLC systems of whatever type.
- the Austrian Authorities start from the view that any new service were not permitted to increase the disturbance level to existing -- in particular -- radio services (broadcast, amateur). As a measure for the evaluation of a complaint as a verified disturbance, levels from an ITU-Recommendation (BS.703) are getting applied by the Austrian radio surveillance and – following to that – by the Austrian Authorities. Based on that, the Authorities are talking about an increasing number of disturbances – the related complaints mainly stemming from radio amateurs, not to say: from the Austrian Radio Amateurs' Association.

This is to be considered regarding the fact that at many sites the actual noise floor – without any PLC system in operation -- is remarkably higher than the above mentioned ITU-limits.

- Representing about 100 Austrian network operators, a part of which is already or would be more or less severely interested in offering broadband PLC services to the public,
- Having followed the standardizational development in the field of PLC and broadband PLC in particular since years,
- Being of the opinion, that the only admittance of EN 55022 in its present form as the basis for presumption / the prove of conformity with the EMC Directive and therefore for CE marking of broadband PLC equipment is not justified,
- Doubting the justification of strict appliance of ITU-limits as mentioned above as a basis for evaluation of complaints as a verified disturbance,
- Questioning the sense of standardization work on emission limitation from PLC systems in the light of the before-mentioned argumentation by Austrian Authorities as well as broadcasters with existing ITU-limits,
- Considering the fact, that any emission limitation standard would result in a loss and a winner group, although the work within the CENELE/ETSI Joint EMC WG at the European level as well as at CISPR 22 is quite valuable, that results in the problem that the PLT issue and the achievement of investment securing framework conditions will not be solvable by standardization (only),
- Calling into doubt a principle concerning EMC which results into the *absolute* defense of already existing telecom services of whatever kind against a new technology which could successfully get used possibly for the price of some affection of existing services, the latter by
  - extending the spectrum of services for the public
  - increasing telecom competition
  - offering commodities in using internet access for a probably higher number of customers, by far, than the number of people concerned by affecting effects on existing services,

- Starting from the assumption that broadband PLC represents a technology which would
  - o offer the option for a quick and easy provision of customers with internet access (and other telecom services)
  - o be followed by other access technologies like fiber to the home after some time span,
- Considering the measurement programs that are being carried out by research groups in Europe who are measuring the radiated emission from the different PLC networks in different geographical areas and EMC environments together with the measurement and understanding of the LCL values of the power line and its relationship to the differential mode, common mode and the architecture of the powerline cable -- it is essential for these empirical measurements to be established for not only PLC systems, but also comparability with other similar established services, including ADSL and VDSL,

the Austrian Association of Electricity Companies (VEÖ)

- ✓ welcomes the attempts of the Commission to support broadband PLC application throughout Europe
- ✓ feels standardization as being only one line in the spectrum of needed actions to ensure investment certainty for broadband PLC systems, to be accompanied by appropriate political decisions and support for ensuring an equal treatment of the issue throughout the Community
- ✓ recognizes the need for a quick solution to the question what might be to be assessed as a verified disturbance, stemming from broadband PLC, to be considered for the taking of mitigation measures by the related network operator
- ✓ 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; *Broadband communications through powerlines as a provisional measure to make it possible to operate different systems in a non-discriminatory way until a stable situation in the standardisation area is obtained*).
- ✓ supports the "Spanish way" as finally having been recognized as a fully appropriate one during the 8<sup>th</sup> Meeting of the EMC Working Party, on 17/9/03 in Luxembourg.

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

With best regards,

**AUSTRIAN ASSOCIATION OF ELECTRICITY COMPANIES**

**Gerhard Bartak**

Deputy Secretary General

**Attachments**