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North American Broadcasters Association

FURTHER WORK ON THE PDNR “POWER LINE HIGH DATA RATE TELECOMMUNICATIONS SYSTEMS”

The North American Broadcasters Association (NABA, www.nabanet.com) is an association of broadcasters in Canada, Mexico, and the United States, and the NABA Technical Committee is its standing technical body. NABA is thus in a position to present the technical viewpoints of the most authoritative association of professional North American Broadcasters in television and sound programme production, post-production, and distribution for terrestrial, satellite, and cable broadcasting.

NABA is a Sector Member of ITU-R and a long-time participant in ITU-R Study Groups, Working Parties, Task Groups, Rapporteur groups, etc. NABA numbers among its members Chairmen, Vice-Chairmen and members of the above groups. NABA also participates widely in the ITU work on radio, television and multimedia services and has a strong interest in spectrum management studies including spectrum engineering techniques, spectrum management fundamentals, spectrum monitoring, and inter-service sharing, interference and compatibility.

In this context, NABA notes that Working Party 1A is developing a Recommendation in Attachment 1 of Annex 5 of Document 1A/163 entitled “Working document toward a preliminary draft new Recommendation – Power line high data rate telecommunications systems”. NABA notes that PLT systems do not have a frequency allocation in the Radio Regulations but do have emissions in the frequency bands allocated to the terrestrial broadcasting services. Recommendation ITU-R BT.1786 entitled “Criterion to assess the impact of interference to the terrestrial broadcasting service (BS)” provides the protection requirements for such devices and systems using the PLT technology. NABA also notes that the broadcasting service is allocated as much as one-third of the spectrum between 1.705 to 80 MHz in which PLT systems have emissions. It is, therefore, appropriate for the PDNR to state, in *considering g*), the above mentioned Recommendation. NABA requests that the square-brackets be removed so that *considering g*) reads:

“g) that some radiocommunication services have established criteria to assess the impact of interference from unintentional RF emitters that produce emissions in the frequency bands allocated to those services, such as criteria in Recommendation ITU-R BT.1786 from the broadcasting service,”

NABA also notes that Working Part 6A is in the process of developing a Recommendation and Report concerning the protection requirements for broadcasting systems from the impact of PLT systems. Consequently, a *noting* should be added:

“a *bis*) that detailed studies relevant to the impact of devices using PLT technology on radiocommunication services are documented in [preliminary draft new] Report ITU-R BS.[PLT REPORT], “Protection requirements for broadcasting systems operating in the LF, MF, HF, and VHF bands below 80 MHz against the impact of Power Line Telecommunication (PLT) Systems”;

NABA further notes that Annex 5 of Document 1A/163 contains various attachments from Administrations describing their national rules and regulations relative to PLT. NABA agrees that it is within the rights of any Administration to establish internal rules and regulations. It is appropriate for these rules to be included as guidance within the working document toward a preliminary draft new Report found in Annex 6 of Document 1A/163. NABA respectfully requests that these Attachments to Annex 5 be moved from the PDNR to the preliminary draft new Report in Annex 6 of Document 1A/163.
