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North American Broadcasters Association (NABA)

SUPPORT FOR REPLY LIAISON STATEMENT TO WORKING PARTY 1A

IMPACT OF POWER LINE TELECOMMUNICATION SYSTEMS ON RADIOCOMMUNICATION SYSTEMS OPERATING IN THE LF, MF, HF AND VHF BANDS BELOW 80 MHZ

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.

Working Party 1A in its liaison statement to Working Party 6A noted a contribution questioning “whether the general protection criteria for the broadcasting service versus non-broadcasting radiocommunication devices as stipulated in Recommendation ITU-R BT.1786 is appropriate for the specific case of Power Line Telecommunication (PLT) systems working in the HF band with its specific characteristics.” The technical contents of this contribution are included as Section 3.1.5 of Document 1A/158, “Preliminary Draft New Report – Impact of power line telecommunication systems on radiocommunication systems operating in the LF, MF, HF, and VHF bands below 80 MHz”. NABA notes here that PLT systems do not have a frequency allocation in the Radio Regulations, and especially not in the frequency bands allocated to the Broadcasting Service. Consequently, Recommendation ITU-R BT.1786 is appropriate for PLT systems. This point has been clearly stated by Working Party 6A in previous liaison statements to WP 1A (see Documents 1A/45 and 1A/84).

NABA appreciates that WP 1A had made WP 6A aware of the subjective assessment test on HF broadcast reception interfered with by PLT. Unfortunately, based on the technical information contained in the document, WP 6A was not convinced that sufficient evidence has been revealed to change the position of WP 6A relative to BT.1786 and PLT. NABA agrees with the conclusion reached by WP 6A.

WP 6A has provided WP 1A with an extensive list of comments which express concern for the validity of the subjective assessment test as well as the test material itself. NABA shares this concern and is in full agreement with WP 6A in its support of Recommendations ITU-R BS.1786 and ITU-R BT.1786. NABA also agrees that the aggregate PLT emissions must be considered and that the emission level of any particular PLT installation must be well below the combined receiver noise and the ambient noise level.

In light of the difficulties with the validity of Section 3.1.5 of Document 1A/158 as expressed by WP 6A in Document 1A/142, NABA strongly opposes the inclusion of this section in the Preliminary Draft New Report.
