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North American Broadcasters Association (NABA)

FURTHER COMMENTS ON THE PROPOSED DRAFT NEW RECOMMENDATION ITU-R BT.[PLT REC]

Protection requirements for broadcasting systems operating in the bands below 30 MHz against radiation from PLT 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 supports the efforts of Working Party 6A to establish protection requirements for the broadcasting service in the presence of interference from wired-telecommunication systems such as Power Line Telecommunications (PLT) systems. NABA notes that Italy and the Vatican City State proposed in Document 6A/310 that Working Party 6A consider a compromise value for the protection requirements of broadcasting services in the presence of interference caused by power line high data rate telecommunication systems. NABA in Document 6A/315, the World Broadcasting Unions – Technical Committee (WBU-TC) in Document 6A/317, and CBS Broadcasting in Document 6A/319 have all supported this effort to reach a compromise solution for an appropriate protection criterion.

NABA notes further that Working Party 1A has developed a draft new Recommendation which addresses the impact of PLT devices on the affected radiocommunication services (see the liaison statement in Document 6A/383). Since it is the responsibility of Working Party 6A and Study Group 6 to develop protection criteria for the broadcasting service, it may be appropriate to further improve the text of the proposed draft new Recommendation in Document 6A/310 so that the

Recommendation reflects the progress made. NABA is pleased to submit the changes shown in the Annex below.

ANNEX

PROPOSED DRAFT NEW RECOMMENDATION ITU-R BT.[PLT REC]

Protection requirements for broadcasting systems operating below 30 MHz against the radiation from PLT systems

(Question ITU-R 32/6)

Scope

This Recommendation defines the protection criteria for broadcasting systems operating below 30 MHz from power line telecommunication (PLT) systems radiation.

Summary

This Recommendation provides the protection criteria for broadcasting services from PLT systems which are not part of any radiocommunication service and therefore have no status in the Radio Regulations but nevertheless inject radiation into the radio-frequency environment and are capable of causing interference in the bands up to 30 MHz allocated to the broadcasting service.

The ITU Radiocommunication Assembly,

considering

- a) that telecommunication systems are being developed and deployed which utilize electrical infrastructure wiring for signal transmission;
- b) that electrical infrastructure wiring is not designed or installed for transmission of signals at radio frequencies, and radiation from the conductors will inevitably occur;
- c) that those telecommunication systems radiate and occupy a broad bandwidth that may affect the use of the broadcasting bands below 30 MHz;
- d) that radiation from such PLT systems may impair or degrade reception of broadcasting services,

recognizing

- a) that the terrestrial broadcasting services are operated in the bands assigned by Article 5 of the Radio Regulations (RR) on a primary basis and are often planned on a noise-limited basis and should be protected in accordance with the RR;
- b) that broadcasting is the most economical and widespread radiocommunication service accessible by the majority of the World's population;
- c) that the broadcasting service is considered by ITU as one of the means of ensuring communications in cases of disaster prevention, mitigation and relief as provided in Resolutions 644 (WRC-07), 646 (WRC-03), 647 (WRC-07), 53 (RA-07) and 55 (RA-07),

noting

- a) the obligations on administrations to ensure the continued availability of the RF spectrum and guard against harmful interference;
- b) that Article No. **15.12** of the Radio Regulations states that: “Administrations shall take all practicable and necessary steps to ensure that the operation of electrical apparatus or installations of any kind, including power and telecommunication distribution networks, but excluding equipment used for industrial, scientific and medical applications, does not cause harmful interference to a radiocommunication service and, in particular, to a radionavigation or any other safety service operating in accordance with the provisions of these Regulations”,

recommends

- 1** that interference by an aggregate of power line telecommunication systems in the bands allocated to the broadcasting service below 30 MHz should increase the total noise floor less than 0.5 dB.
