



International Amateur Radio Union Region 1

Europe, Middle East, Africa and Northern Asia

Founded 1950



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1. Summary

In the last three years, the main activity of the EUROCOM working group has been focused on two topics:

- Power Line Telecommunications (PLT)
- New EMC Directive .

2. Powerline Telecommunications

When issuing Mandate 313 in August 2001 the European Commission expected the CENELEC/ETSI Joint Working Group to draft a standard for telecommunications networks within a few months. But the work of the JWG is progressing slowly, mainly due to the difficulty to write a standard covering also broadband electronic communications through powerlines.

Therefore the European Commission convened a restricted "Stakeholders" meeting January 9, 2003. It became evident that the European Commission supports PLC as a tool for market competition. Apparently, short wave broadcast and HF amateur radio are not considered as important. Only security services need protection. Mandate 313 was confirmed.

March 2003, a delegation of EMC managers of several IARU Region 1 societies, convened by the EUROCOM chairman, met Mark Bogers and Thierry Brefort, the main EU officials in charge of PLC. Several technical presentations were used to try and convince the EU representatives of the need to protect the spectrum users from the high interference levels generated by PLC. From the discussion it became clear that, although the technical arguments were accepted, the decision would be a political one.

April 2003, a meeting was convened by the World Broadcast of Radio Nederland in Hilversum. Mark Bogers, EC Directorate Industry, accepted to meet a group of HF users to discuss the PLC issue. It became clear that the EU would promote large scale PLC trials.

July 2003, the EUROCOM WG chairman received a letter from the EU Commission calling for comments on the PLC issue. The comments would be summarised and submitted to a restricted PLC Workshop. Hilary Clayton-Smith, G4JKS accepted to prepare a contribution on behalf of IARU Region 1. The EU PLC Workshop was convened October 2003 and restricted to Member States representatives. Mandate 313 was extended to allow more time to the JWG.

November 2003, a DARC delegation, accompanied by ON4WF, visited a German Member of the EU Parliament in Brussels and presented the PLC issue.

February 2004, as the result of one more EU Workshop on PLC, the EU Commission decided to prepare a Commission Recommendation. This Recommendation has been prepared by COCOM, the Communications Committee created by article 22 of Directive 2002/21/EC of 7 March 2002 on a common regulatory framework for electronic communications networks and services (Framework Directive). The draft Recommendation stated:

(9) If a network deemed compliant is still creating local interferences or affecting safety services, Member States should take specific measures according to Article 6 of the EMC Directive, with a view to resolve such interferences. In resolving interference between a compliant network and a radio communications service, Member States should take into account the importance of the services, as well as technical and economic aspects. Measures taken should be proportionate, non-discriminatory and transparent.

We asked MEP Fernando Fernandez-Martin (EA8AK) to address a written Parliamentary Question to the European Commission, pointing out that “*if the text of the Recommendation is maintained, as approved by COCOM July 7th, it would constitute a breach of the Radio Regulations of the ITU (International Telecommunications Union), which have the force and effect of a treaty committing the responsible public administrations.*”

The Commission rejected the argument stating that it “*does not consider that the community norms, including the recommendation under preparation, are therefore incompatible with the ITU, in as far as the objective of the normative measures is to protect radiocommunications by solving interference problems*”.

The COMMISSION RECOMMENDATION on broadband electronic communications through powerlines was signed 6 April 2005 and published in the Official Journal of April 12th. The introductory recital states:

If a system is deemed compliant but is nevertheless creating harmful interference, the competent authorities of the Member States should take special measures according to Article 6 of the EMC Directive, with a view to resolving such interference. Measures taken should be proportionate, non-discriminatory and transparent. In examining the proportionality of measures, Member States should take into account economic and social aspects of the services involved. Member States may also take into account the technical capability of modern powerline communications equipment to allow for a timely resolution of interference problems by reducing emissions at the specific interfering frequencies and places by so-called ‘notching’.

27 April 2005 a DARC delegation, accompanied by EUROCOM chairman Gaston Bertels, met in the European Parliament with German MEP’s and with EC officials Marc Bogers and Thierry Bréfort. Thilo Kootz, DL9KCE presented the case of Amateur Radio exposed to PLT interference. The position of the Commission officials was the same as in March 2003: “one shall take into account the economic aspects and allow European manufacturers to compete with US products”. With the MEP the possibility was examined of a Parliamentary Question on the need to provide notches on the amateur radio bands.

Meanwhile the work of the JWG continues. Hilary Clayton-Smith, G4JKS and Ha-Jo Brandt, DJ1ZB are working hard for acceptable limits of unwanted radiation in the draft telecommunications network standard.

3. New EMC Directive

At Ham Radio 2003, Christian Verholt, OZ8CY EMC WG chairman, asked ON4WF to undertake action in the field of the draft new EMC Directive. This draft Directive would open the possibility for manufacturers to put on the market products certified to be conform to the EMC requirements, without control by a certified body.

September 2003, the local DARC club convened a meeting in Werl, near Dortmund, Germany with Members of the EU Parliament. Nearly 200 DARC members assisted. EUROCOM chairman ON4WF presented a few amendments he had drafted to the new EMC Directive. The MEP were supportive.

The new EMC Directive 2004/108/EC has been published in the Official Journal of the European Union December 2004. As a consequence of the SLIM process (Simpler Legislation for the Internal Market), the new Directive relaxes the certification requirements for electrical appliances. This can result in the putting on the market of appliances with doubtful EMC compliance, and consequently in more complaints.

On the other hand, whereas the draft Directive provided a very simplified definition of EMC, EUROCOM prepared several amendments proposing instead the EMC definitions of the International Technical Committee (IEC). These amendments, submitted by several Members of the European Parliament and adopted by the Parliament, have been maintained.

Moreover, another EUROCOM amendment has also been adopted. See underlined text:

(2) Member States are responsible for ensuring that radiocommunications, including radio broadcast reception and the amateur radio service operating in accordance with International Telecommunication Union (ITU) radio regulations, electrical supply networks and telecommunications networks, as well as equipment connected thereto, are protected against electromagnetic disturbance.

Last but not least, the exception for amateur radio homemade equipment - absent from the initial draft - has been reintroduced and extended to modified commercial equipment:

Article 1.2

This Directive shall not apply to:...

(c) radio equipment used by radio amateurs within the meaning of the Radio Regulations adopted in the framework of the Constitution and Convention of the ITU, unless the equipment is available commercially. Kits of components to be assembled by radio amateurs and commercial equipment modified by and for the use of radio amateurs are not regarded as commercially available equipment.

The European Commission has drafted new Guidelines accordingly to the new EMC Directive 2004/108/EC. These Guidelines will become applicable 20 July 2007. EUROCOM chairman has asked the European Commission the possibility to comment the drafted text. The European Commission will accept comments till 30/06/2005.

4. WRC-07

March 2005 a joint meeting was convened in Brussels by CEPT and the European Commission to prepare WRC-07. The objective of the consultation meeting was to gather inputs that will be used to formulate the policy objectives of the Community in the context of WRC-07.

IARU/EUROCOM was invited to participate. EUROCOM chairman had asked DG (Directorate General) Information Society permission to present a written document to the meeting, presenting the Amateur Radio Service's action points for WRC-07. This was granted and Hans Blondeel-Timmerman, PB2T, IARU R1 EC member, prepared an Information paper on the Amateur Radio Service, highlighting the main agenda point on the WRC-07 agenda relative to amateur radio : the still unsatisfied requirement for a globally harmonised allocation of 300 kHz around 7 MHz.

The IARU R1 paper was included in the binder for the meeting. When the HF bands came under discussion EUROCOM chairman was invited to introduce the paper. In my short presentation, I recalled the fact that Region 1 has not yet completely recovered the frequency segment lost in the 7 MHz band seventy years ago. I thanked CEPT and the European Commission for their support which has led to the recovery of 100 kHz at WRC-03. I acknowledged the difficulty to achieve the recovery of the remaining 100 kHz but stated, in French, that “Nul n’est besoin d’espérer pour entreprendre ni de réussir pour persévérer”, which I translated as “No hope is needed to undertake, nor is success to persevere”.

This introduction was received extremely well. ERO representative Fatih Mehmet Yurdal took the floor to support our request, insisting on the importance of the Amateur Radio Service in many aspects.

5. EUROCOM meetings

EUROCOM meetings were held at Ham Radio, Friedrichshafen in 2003 and in 2004.

A meeting will also be convened in 2005.

6. EUROCOM Newsletters

In 2003 – 2004 twenty EUROCOM Newsletters were circulated, many with important annexes appended.

The EUROCOM Newsletters are presently circulated to 119 addressees.

7. Thanks

We wish to extend special thanks to :

- MEP Fernando Fernández Martín, EA8AK
- MEP Dr Peter Liese, Germany
- MEP Helmut Kuhne, Germany

who kindly accepted to submit the EUROCOM amendments to the EMC Directive to the European parliamentary committee on Industry, External Trade, Research and Energy (ITRE).

We are grateful to DARC for kindly hosting the EUROCOM meetings and to Hans Berg, DJ6TJ for publishing the EUROCOM Newsletters in downloadable format on the DARC Website.

Many thanks also to the EUROCOM correspondents for their support and response when called to action on important issues.

Respectfully submitted

Brussels, 27 April 2005

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