# SSO/SSIG(11)02

TSI/1447/TSI

10 March 2011.

# Power Line Technology and Associated Home Networking Devices.

Government Communications Headquarters (GCHQ) wishes to express its concern over the manufacture, importation, and sales of equipment used in support of the above technology.

In the main, this equipment is not CE marked and currently meets no EMC standard with specific regard to radio interference in the HF, VHF, and UHF spectrum. The lack of protection is likely to cause a detrimental affect to part of the core business of this Department.

We are already measuring an increase in the HF noise floor in the vicinity of our HF receiving stations, with wide variations between day time and night time levels. The propagation of noise in this band also varies according to seasonal changes and other natural phenomena.

In the Power Line Technology (PLT) meeting of 8 February 2011 the Civil Aviation Authority, amongst others, expressed a view that the RFI from these devices was likely to pose a safety of life risk. We concur and support this view from our own perspective.

Other interference issues have been raised by MoD, BBC, RSGB, and other players in the telecommunications industry.

Although not wishing to be product specific, we understand that Comtrend currently estimates that in excess of 1.5 million units are in circulation within the UK and that numbers are due to escalate significantly with the release and promotion of 'Youview'. Additionally, BT's Vision service also supplies the Comtrend 9020 product.

Currently there is no agreed harmonised standard to regulate these devices and therefore, de facto, they should not be available for sale/use within the EU. Ofcom and the Department for Business Innovation & Skills (BIS) do have powers under existing legislation to stop the current rollout of this technology, and GCHQ would petition them to act to ensure the situation does not deteriorate such that HF communications reception becomes impossible.

The Wireless Telegraphy Act gives provision for Ofcom to act in such matters. The BIS report 'The General National Market Surveillance Programme for the UK – 2011' issued in December 2010 specifically states "(it) is to ensure the free circulation of safe and otherwise compliant products in the UK". PLT equipment as described does not satisfy this requirement.

From: Sent:

18 March 2011 07:32

To:

Subject:

RE: PLT statement by GCHQ

Dear All.

There is a fundamental typing error in the document; it appears two lines have got transposed during copying up. Please ignore the text (a correct version will be released later) but the thrust of the document is correct.

Apologies for this.

Regards

----Original Message----

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From:

Sent: Thursday, March 17, 2011 2:31 PM

To:

Cc:

Subject: PLT statement by GCHQ

Dear All

Attached is a statement by GCHQ, which is circulated for your information.

Regards

<<17 March 2011 - SSO SSIG(11)02 - Power Line Technology and Associated Home Networking Devices.DOC>> Spectrum Policy Team Department for Culture, Media and Sport | 1 Victoria Street | London SW1H 0ET email: @bis.gsi.gov.uk <mailto:firstname.lastname@bis.gsi.gov.uk> | tel:

\*

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### **UNCLASSIFIED**



GCHQ Reference: TSI/1447/TSI

Date: 21 March 2011

The following statement has been released by Director of Engineering and Technology.

TSI/1447/TSI

10 March 2011.

# Power Line Technology and Associated Home Networking Devices.

Government Communications Headquarters (GCHQ) wishes to express its concern over the manufacture, importation, and sales of equipment used in support of the above technologies.

Despite public assurances given by Ofcom we believe some of this equipment may not meet the Essential Requirements of the EMC Directive. While they rely on the current applicable IT Harmonised Standard in part, much of the compliance documentation of these products appears to rely upon withdrawn committee draft documentation which does not adequately protect the spectrum from radio interference in the HF, VHF, and UHF spectrum. We accept it may meet parts of other standards. The lack of protection is likely to cause a detrimental affect to part of the core business of this Department.

We are already measuring an increase in the HF noise floor in the vicinity of our HF receiving stations, with wide variations between day time and night time levels. The propagation of noise in this band also varies according to seasonal changes and other natural phenomena.

In the Power Line Technology (PLT) meeting of 8 February 2011 the Civil Aviation Authority, amongst others, expressed a view that the RFI from these devices was likely to pose a safety of life risk. We concur and support this view from our own perspective.

Other interference issues have been raised by MoD, BBC, RSGB, and other players in the telecommunications industry.

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Government Communications Headquarters

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### **UNCLASSIFIED**

Although not wishing to be product specific, we understand that Comtrend currently estimates that in excess of 1.5 million home networking units are in circulation within the UK and that numbers are due to escalate significantly with the release and promotion of 'Youview'. Additionally, BT's Vision service also supplies the Comtrend 9020 product.

While we acknowledge that an item specific harmonised standard to regulate these devices is under consideration, we are concerned that in its present form it may still not provide adequate protection for the spectrum. Ofcom and the Department for Business Innovation & Skills (BIS) do have powers under existing legislation to stop the current marketing of this technology, and GCHQ would petition them to act forthwith before the situation deteriorates such that HF communications reception in some areas becomes virtually impossible.

The BIS report 'The General National Market Surveillance Programme for the UK – 2011' issued in December 2010 specifically states "(it) is to ensure the free circulation of safe and otherwise compliant products in the UK". We believe that PLT and home networking equipment as described does not satisfy this requirement.

The Wireless Telegraphy Act also gives provision for Ofcom to act against specific instances of interference from this technology when in use. We urge them to adopt such powers.

Responses to this statement should be addressed, in the first instance, to:

, Spectrum Manager,

GCHQ Hubble Road Cheltenham GL52 0EX From:

Sent:

06 April 2011 07:27

To:

Cc:

Subject:

RE: PLT statement by GCHQ

As per  $$\operatorname{email},$$  , Deputy Director Technical Capability has requested that I issue the rollowing on behalf of GCHQ.

Would you be kind enough to circulate as appropriate.

To: Members of the PLT working group.

Dated: 4 April 2011.

Reference: Document released by GCHQ dated 21 March 2011 TSI/1447/TSI.

It has emerged that a number of inaccuracies appeared in the above document and GCHQ wishes to unreservedly withdraw it forthwith.

Any queries regarding this should, in the first instance, be addressed to:

GCHQ Hubble Road Cheltenham GL52 0EX

\gchq.gsi.gov.uk

Thank you

This information is exempt from disclosure under the Freedom of Information Act 2000 and may be subject to exemption under other UK information legislation.

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