

## Your response

Question	Your response
<p>Do you agree with our proposal to take steps to mitigate risks related to EMF and be in a position to hold licensees, installers and users to account if issues are identified? Please explain the reasons for your response.</p>	<p>Confidential? – N</p> <p>Whilst the concept of mitigating these risks is a sound idea, it needs to be done competently with a full consideration of all of the risks and issues.</p> <p>The approach needs to be justifiable, proportionate, objective and in accordance with law. The proposal appears to be in breach of the in breach of Ofcom statutory duties in that regard, and would be an unnecessary burden on the technical part of the radio community. The proposal also usurps the role of the HSE &amp; PSE and issue should be left for them to address.</p> <p>The proposal is certainly not objectively justified, and fails to take into account training already provided to the community. As an example even the amateur radio community has a long standing existing requirement to take into account RF safety, and this is accepted by those formally responsible for public health.</p> <p>The document provides no impact assessment, contra to what I believe is a government requirement. Given the combined economic shock of Covid-19 and Brexit, any impact assessment would now be out of date, so at least Ofcom have not wasted effort, BUT this proposed ruling cannot proceed without an assessment on the impact to the many stakeholders, a great many of whom are already in economic and social shock.</p> <p>The proposal is disproportionate and discriminatory and will impact a number of services. The amateur radio community have pointed this out to you, and it is well known that they are very much the canary in the coal mine when it comes to such matters, often vocalizing issues on which others do not have the competence to address, or where commercial or political pressures cause silence.</p>

**Do you agree with our proposal (a) to include a condition in spectrum authorisations requiring compliance with the basic restrictions for general public exposure identified in the ICNIRP Guidelines; and (b) that this condition should apply to equipment operating at powers greater than 10 Watts?**

Confidential? – N

- (a) I support the competent application of the current ICNIRP guidelines. However this does not appear to be such a proposal. The method of implementation is problematic and there are significant technical errors. This implies that the proposal is outside the competence of Ofcom and would be better left in the hands of radiation health specialists.
- (b) Using such as simplistic approach is inappropriate. The concept of power needs to be refined in terms of the integrated absorption of power over a period agreed by the medical profession as sufficiently safe. The use of EIRP is inappropriate as this is a far field consideration whereas the hazard occurs in the near field before the far field has formed. Furthermore, consideration needs to be given to the multitude of different operational conditions in which radio transmitters are deployed and the duration of that deployment.

**Do you agree with our proposed guidance on EMF compliance and enforcement? Please explain the reasons for your response.**

Confidential? – N

Firstly, I doubt that Ofcom has the resources to enforce this given that it is so stripped of field resource that it is unable to address radio interference issues. In particular the non-standard nature of radio systems outside the mobile phone sphere, in particular the wide range of frequencies, powers and antenna configurations (some of which are dynamic) means that a significant level of expertise is needed to assess each situation, and I doubt that sufficient resource exists in the country let alone within Ofcom.

Secondly, there is a conflict between the concepts of guidance and within the Ofcom proposal.

In regulatory terms this matter would be better addressed by existing organizations that specialise in health and safety matters, and rather than the proposed heavy-handed



enforcement approach a mixture of light touch regulation and education would be a more constructive and productive way forward.