

Your response

Question	Your response
<p>Question 1: Please provide feedback on the additions, amendments and clarifications we have made to the wording of the licence condition to implement our decisions on the scope of the licence condition in our October 2020 Statement, giving reasons for your response.</p>	<p>Confidential? – N</p> <p>The RNLI is content with the proposed changes to the wording of the EMF compliance condition that will be applied to our existing and any new spectrum licences. The clarified definition of ‘General Public’ is an important welcome addition as is the recognition of the importance of radio communications in search and rescue activities, including maritime emergencies.</p>
<p>Question 2: Please provide feedback on the additions and clarifications to our ‘Guidance on EMF Compliance and Enforcement’, giving reasons for your response.</p>	<p>Confidential? – N</p> <p>The RNLI is pleased that Ofcom has addressed our main technical difficulties with the initial statement and consultation. In particular:</p> <ul style="list-style-type: none"> • The provision of exemptions for qualifying users of shared radio sites • The consideration in EMF calculations of non-continuous transmissions typical of two-way radio message exchanges. • The guidance given for demonstrating compliance for in-vehicle and temporary site transmissions.
<p>Question 3: Please provide feedback on the trial version of our EMF calculator, giving reasons for your response.</p>	<p>Confidential? N</p> <p>The ‘instructions for use’ of the EMF Calculator gives an example calculation using the term ‘duty factor’. This requires an explanation of what it is. A note should be given to explain why a ‘duty factor’ value can be included in the calculation. How is it different and why is it an addition to the more usual TXtime/RXtime ratio, typical in two-way radio communications.</p>