

Title:

Mrs

Forename:

Jayne

Surname:

Papworth

Representing:

Self

What do you want Ofcom to keep confidential?

Keep nothing confidential

Question 1: Are there any reasonable grounds why Ofcom should not grant the request to vary the five Wireless Telegraphy Third Generation Mobile Licences by increasing the permitted maximum in-band EIRP to 68dBm as soon as practicable? If so, please explain your reasoning for this:

We live just over 350 metres from a Vodafone mast, and although out of the beam of greatest intensity, are impacted by RF signals well above the Salzburg precautionary levels. In addition our children attend the nearby primary school within 130metres of the same mast which is within the beam of greatest intensity and readings at the school perimeter already exceed Salzburg and Bioinitiative outdoor levels. The decision relating to the increase in the power of all 2G and 3G masts is not for us a purely technical one as suggested in the consultation: it is a social and health related issue.

Firstly, we object to the proposal as the consultation is insufficiently clear about what is being proposed. A move from 62Dbm to 68Dbm may seem small on paper, but in relation to actual power output represents a 4 fold increase in the actual signal strength. We strongly feel the consultation would receive a very different level of response if people were aware you are proposing to allow the 5 major mast operators to potentially quadruple the power output of their masts.

Secondly, we object to the proposal as it is clearly consulting on something so significant in a very low key and almost dismissively procedural way to a minority. Specifically, the balance between reflecting the commercial interests of the 5 major operators and the public interest is weighted towards the commercial interest. (For example, why are Ofcom restricting the scope of the consultation response to 2 key questions, why are they themselves pushing the upper limit of the proposed increase higher than the mast operators have originally requested).

The direction of travel of most other European nations is to err on the side of caution and look to reduce the exposure of the general public, you are proposing to not only increase it, but to voluntarily offer a greater scope for an increase to save yourselves the administrative burden some time in the future. This appears both misguided in the current environment and

reflecting commercial pressure over health interests. The consultation gives no weight to the potential impact on the health of local communities, beyond a passing reference to the ICNIRP guidelines, which you will know have been widely discredited even within Government circles (Stewart Report, 2000).

More recently, the Bioinitiative Report (2007) has provided further and more compelling evidence of the need to adopt a precautionary approach where mobile phone masts are cited close to residential areas and vulnerable groups (schools, children centres, day centres, etc). In particular, the Bioinitiative report states:

Biologically-based public and occupational exposure standards for extra-low frequency and radiofrequency radiation are recommended to address bio effects and potential adverse health effects of chronic exposure to ELF and RF. These effects are now widely reported to occur at exposure levels significantly below most current national and international limits.

Plausible biological mechanisms that can account for genotoxicity (DNA damage) are already well known (oxidative damage via free-radical actions) although it should also be said that there is not yet proof. However, proof of mechanism is not required to set prudent public health policy, nor is it mandatory to set new guidelines or limits if adverse health effects occur at lower than existing IEEE and ICNIRP standards.

Thirdly, we object to the proposal as it fails to take into account the particular impact such an increase would have on children in schools and the most vulnerable. It is a well understood (although not well implemented) policy that mast operators should avoid the beam of greatest intensity falling on schools or other premises where the young and frail spend much of their time. How will a policy to increase output take account of the increased exposure on such vulnerable groups?

Fourthly, we object on the grounds it represents a fundamental breach of our human rights: right to life. An environmental hazard such as this consultation proposes presents a very real and high risk to the lives of the people living, working and spending time near to the masts: what information about that hazard will you be providing to every citizen in the UK to enable the people to take steps to protect themselves and their families?

Question 2: Are there any reasonable grounds why Ofcom should not also apply the increased permitted maximum in-band EIRP to future 2 GHz MSS/CGC licences? If so, please explain your reasoning for this:

The question as to whether 2G masts should be allowed to increase their power output: whilst making any consultation process easier to Ofcom by subsuming it within this process, seems to have limited validity beyond this convenience.

If, as started in paragraph 3.5, the basis of this proposal is to accommodate new and emerging post 3G technologies, upgrading the power output of the previous generation masts appears redundant.