

## 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>ESOA generally agrees with Ofcom’s proposal. ESOA further suggests to include reference to other standards very similar to the ICNIRP guidelines, specifically, <b>IEEE standard C95.1-2019</b>: “IEEE Standard for Safety Levels with Respect to Human Exposure to Electric, Magnetic, and Electromagnetic Fields, 0 Hz to 300 GHz”, <b>EN 50665: 2017</b> “Generic standard for assessment of electronic and electrical equipment related to human exposure restrictions for electromagnetic fields (0 Hz - 300 GHz)” and <b>EN 62311: 2020</b> “Assessment of electronic and electrical equipment related to human exposure restrictions for electromagnetic fields (0 Hz to 300 GHz)”. Some of the satellite terminals deployed in the UK are specifically required to meet these standards, and ESOA would welcome Ofcom to accept compliance with this standard as being an acceptable reference.</p> <p>At a minimum, ESOA thus requests that OFCOM also accept compliance with IEEE standard C95.1-2019, EN 50665: 2017, EN 62311: 2020 or the ICNIRP guidelines issued in 1998 for already deployed equipment.</p>
<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?</p>	<p>Confidential? – N</p> <p>The satellite industry agrees with the need for equipment compliance with EMF exposure limits, including the reference levels in Tables 5-7 of the most recent ICNIRP guidelines (2020). Nonetheless, ESOA feels that Ofcom’s license condition ought to be explicit and unambiguously recognize that compliance with Tables 5-7 of the ICNIRP guidelines is a means to show compliance with the basic requirements. While Ofcom seems to recognize it, we believe the language could be clearer e.g. in paragraph A2.7, where Ofcom states " if the reference levels are met this <u>should</u> ensure compliance with the basic restrictions." (emphasis added))</p>

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

Confidential? – N

1. Considering the number of satellite terminals that are already deployed in the UK, ESOA supports Ofcom's approach of making compliance checks on an adhoc basis, where there is some evidence of a potential risk of non-compliance. Attempting to do a check of all satellite earth stations in operation today would be overly burdensome on both Ofcom and satellite service providers.

2. ESOA also recommends that Ofcom factor in whether an installation was made prior to the EMF license condition being added in determining any potential enforcement action. Installations made prior to application of the new EMF license condition should be provided more leeway in simply fixing any issue, versus other more punitive enforcement action. For example, it would seem reasonable for Ofcom to provide additional time for compliance in the case that an old terminal initially licensed before the new rules is found to be non-compliant.