

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>Partial Agreement</p> <p>This proposal is only reasonable and proportionate if it imposes obligations on users for the emissions from their own equipment.</p> <p>On multiple occupancy sites, individual organisations do not have access to the parameters of the transmitting sources, the gain of antennas or their radiation patterns and would therefore be unable to calculate total EIRP in every direction through 360°.</p> <p>As the proposal is retrospective by applying to current users it would require significant (i) costs to be incurred by all users of the radio spectrum to survey every radiating site they use that has multiple users; and (ii) time for each user to be able to ensure compliance by performing the necessary checks.</p> <p>It has been Ofcom (and other authorities) policy for some years to encourage users to share masts and towers as opposed to each user building new structures in close proximity to each other. By adopting this approach the proposal will now discriminate against users by requiring them to perform the surveys to ensure the collective non-ionising radiation limits are not exceeded in any direction where the public have access.</p> <p>The only organisation that could hold the collective information for each site is Ofcom.</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>(a) Partial agreement</p> <p>For the reasons set out above the technical and financial burden the proposal would place on each user at all multiple occupancy sites would be unreasonable and disproportionate. In particular, where smaller organisations share the masts or towers of major (e.g. local or community WiFi providers, small mountain rescue teams, etc.) the technical and financial burden will be extremely onerous and therefore these community and charity organisations may have to cease operating, to the detriment of the public.</p>

	<p>The organisation that has the ability to perform the technical assessment of multiple occupancy sites in a transparent and non-discriminatory manner is Ofcom.</p> <p>(b) Partial agreement</p> <p>We agree that the power limit is sensible, though as outlined in the responses above, placing the responsibility on each user of multiple occupancy sites is not.</p> <p>The organisation that has the ability to perform the technical assessment of multiple occupancy sites is Ofcom. By Ofcom performing the audit using their own records also removes any security issues that some potential users may have (i.e. the MoD, Security Services and others) and the confidentiality of any competing network operators.</p> <p>The proposal raises some key concerns in relation to its application. For example, does a single structure (mast or tower) with 40 transmitters each radiating at 8 Watts EIRP present a greater or lesser health and safety risk than a structure with 2 transmitters each radiating at 12 Watts?</p>
<p>Do you agree with our proposed guidance on EMF compliance and enforcement? Please explain the reasons for your response.</p>	<p>Do not agree</p> <p>For the reasons set out above, it is not possible for individual users to comply with this proposal without incurring significant costs to perform regular and periodic tests of each of the multiple occupancy sites they use. These users have no way of knowing what additions or changes have occurred at a site between one audit and the next.</p> <p>As Ofcom issue all radio spectrum licenses to all the potentially affected users and organisations, it would be more efficient and reliable if Ofcom performed the technical assessment for all current licenses. It would then be very efficient and transparent for Ofcom to then update their own records as part of the license issuing process to ensure that all sites are always compliant.</p>