

Your response

| Question | Your response |
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| <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>Yes; the International rules are clear and should be followed. The Authority should establish routine field test for ensuring the respect over time.</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) NO: Rationale 1: Today the presence of “unlicensed” mass market radio devices (e.g. RLAN in 5 GHz and soon in 6/7 GHz as well as WDT in 57-71 GHz, possibly also not in the same station, but close by), with high EIRP permitted, would render impossible a “legally clear” declaration. Even if pre-license field test are done, there is no guarantee that the situation will remain constant in future. Rationale 2: Suitable alternative is that each licensed station shall evaluate/assess “ITS OWN” situation (it can be possible through pfd calculation or through a “delta” test with the new TX turned OFF and then ON) so as to allow the authority to make an overall estimation of the area and eventually establish a monitoring over time.</p> <p>(b) NO: Rationale 1: The EIRP only is not “fair”; it does not take into account the antenna directivity, which plays a big role on EMF on general public. For example, a typical fixed service (FS) Point-to-point link has EIRP in the range of 50 to 70 dBm (100 to 10K Watts); however, it is concentrated over small angle (typically in the range 1 to 5 degrees) and the need for LOS (Line of sight) propagation would never imply any “public area” being concerned (see ETSI TR 102 457). On the contrary, mobile base stations, even with little more than 10 Watts EIRP, would spread their EMF over large angles (e.g. up to 120°) and on human activities very close to the antenna Rationale 2: Suitable alternative should be posing a combined limit among EIRP and antenna beamwidth angle (i.e. 3 dB beamwidth) with the limit posed in terms of suitable formula (e.g. Watt*degrees)</p> |

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

NO:

Rationale: No unless different assessment and limits are considered; as those given, for examples, in Rationale 2 (Suitable alternatives) for both the above questions