

## 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>Yes – Obviously any risk to public health has to be taken very seriously.</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</p> <p>b) No</p> <p>I am objecting to this proposal on the grounds that it will be impossible to comply, which could potentially lead to sanctions due to circumstances beyond our control.</p> <p>My two main objections would be:-</p> <ul style="list-style-type: none"> <li>• The tone of the proposal is very much orientated towards 5G mobile phone masts, only it doesn't actually say this and states that it applies to all transmitters of over 10 watts</li> <li>• Even if it did apply to us then we cannot provide the documentation that they are asking for, as it doesn't exist.</li> </ul> <p>From the Overview</p> <p>“We are proposing to include a specific condition in Wireless Telegraphy Act licences requiring licensees to comply with the relevant levels from the ICNIRP Guidelines. This condition would apply to all equipment which can transmit at powers above 10 Watts (including, for example, the licences of mobile phone companies, TV and radio broadcasters and most point-to-point microwave links<sub>2</sub>). “</p>

My reservation is that this it seems to lump manufacturers, installers and operators of all radio equipment together. The whole tone of the document points towards 5G mobile phone masts, but I cannot see anything, anywhere, that suggests that it does not apply to end-users, such as ships or even taxis. It specifically mentions the lower power limit to which this applies is 10 watts, so as most marine VHF's are 25 watts it casts a very wide net.

Are we seriously suggesting that not only commercial operators, such as ship owners, have to spend thousands of pounds for test equipment to measure equipment that costs a fraction of this. In one of the FAQs it specifically states that this proposal is also applicable to radio amateur stations – there is no way that they can comply at a reasonable cost.

Quite frankly, if intended for operators such as us we simply cannot comply, whether we want to or not. We buy a piece of equipment off the shelf, either as a new-build or as a retrofit. At no stage of the proceedings do we receive, or even see, any records regarding the level of non-ionising energy.

There are various proposed conditions and it would be pointless to argue against them one by one. But, for instance

4.22 One of the key standards in this area is IEC62232 "Determination of RF field strength, power density and SAR in the vicinity of radiocommunication base stations for the purpose of evaluating human exposure. This standard specifies the evaluation and calculation methods that should be used when installing radio equipment for use on frequencies from 110 MHz to 100 GHz.

4.23 The standard includes a recommended approach for installers or operators of radio

	<p>equipment to undertake product installation evaluations when installing the equipment.</p> <p>Neither the installers or operators of ship stations have the competence to comply with the above.</p> <p>Whilst the intention of the proposal is laudable I honestly feel that this has not been thoroughly thought through and will lead to many who simply cannot, rather than will not, comply.</p>
<b>Do you agree with our proposed guidance on EMF compliance and enforcement? Please explain the reasons for your response.</b>	See above