

Implementation of measures to require compliance with international guidelines for limiting exposure to electromagnetic fields (EMF)

BT's response to the further consultation published on 5 October 2020

16 November 2020

Executive summary

1. BT¹ welcomes Ofcom's decision to further consult on a revised wording for the proposed WT Act licence provisions relating to EMF compliance, including the clarifications in relation to shared sites. We agree that the proposed wording is suitable to implement Ofcom's intended policy objective.
2. We also welcome the updated proposed "Guidance on EMF Compliance and Enforcement" that is to be referenced in licences. This provides helpful clarification of a number of issues and should give licensees comfort that the approach they are taking towards compliance with the licence obligations should be satisfactory to Ofcom.
3. We agree that the online EMF calculator that Ofcom has provided is a useful tool for parties that may not have their own tools available. We note this does not preclude the use of other, potentially more sophisticated tools, that can be used to demonstrate compliance with the licence requirements.

¹ Including its subsidiary EE Ltd.

1 Introduction

BT has extensive interests in the operation of radio networks of all kinds, most notably mobile networks, satellite networks and microwave fixed links where we hold a very large number of WT Act licences that would be affected by Ofcom's proposals. We also provide our customers with equipment that is subject to licence-exempt use, such as wi-fi routers.

We welcome Ofcom's active involvement in the issue of RF safety compliance through its independent measurements and we recognise the potential advantages to public confidence if suitable specific provisions could be agreed that would be suitable for inclusion in appropriate WT Act licences. This would also help ensure that all radio users are clear on their obligations and the need to ensure compliance.

We set out our detailed views and provide evidence in response to each of the consultation questions in section 2 below.

2 Response to the consultation questions

Question 1: Please provide feedback on the additions, amendments and clarifications we have made to the wording of the licence condition to implement our decisions on the scope of the licence condition in our October 2020 Statement, giving reasons for your response.

BT agrees that the revised proposal for licence wording is suitable to implement Ofcom's policy objective. We welcome the clarifications and exemptions in relation to shared sites that Ofcom has included in the revised proposal.

Question 2: Please provide feedback on the additions and clarifications to our 'Guidance on EMF Compliance and Enforcement', giving reasons for your response.

BT welcomes the additions and clarifications that have been made to the 'Guidance on EMF Compliance and Enforcement'. This document gives helpful clarification of a number of issues and should give licensees comfort that the approach they are taking towards compliance with the licence obligations should be satisfactory to Ofcom.

Question 3: Please provide feedback on the trial version of our EMF calculator, giving reasons for your response.

As a calculator intended to provide a means to undertake an approximate (and conservative) check that an installation will not breach the ICNIRP limits, we have no comments to provide. We understand that the calculator is aimed primarily at parties that may not have the necessary expertise or may not have access to more detailed calculation tools. We understand that Ofcom would have no objection to organisations using more detailed calculation tools if these are available to them and would recognise the results of such calculations when assessing compliance with the licence requirements in relation to compliance with the ICNIRP EMF thresholds applicable to protection of the general public.
