

Your response

Question	Your response
<p>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.</p>	<p>Confidential? – N</p> <p>The changes do not appear to reflect the feedback from the first round of consultation where most respondents considered this unnecessary.</p> <p>It has not been made clear how this additional regulatory burden is justified in terms of it being proportional and transparent.</p> <p>There is still a lack of clarity over the areas covered by the Licence amendment. For example, a roof top may be accessible by a neighbour using a ladder but it is not routinely accessed. Does the absence of a permanent ladder mean it is not accessible? Would it not be better worded ‘...in any area that is routinely accessed by the general public.’?</p> <p>Maybe the clause should be worded in proper risk assessment language, ‘...where the general public is likely to be present’. With due consideration of the likely exposure, there would be little justification for draconian radiation restrictions, or enforcement action based on a theoretical, rather than a genuine risk.</p>
<p>Question 2: Please provide feedback on the additions and clarifications to our ‘Guidance on EMF Compliance and Enforcement’, giving reasons for your response.</p>	<p>Confidential? – N</p> <p>The enforcement statement needs to take a leaf out of the HSE book and make a clear distinction between ‘minor’ breaches, where no significant risk has been realised and a warning or a modification of Licence terms may be appropriate, and ‘gross breaches’ where there is a flagrant disregard for the Licence condition and criminal sanction may be more appropriate.</p>

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

Confidential? – N

The provision of an 'Ofcom approved' calculator is very welcome but the current version is not user friendly for the 'non-technical' licence holder. The inputs need to be much more straightforward with automated calculations to work out the EIRP. Most 'non-technical' Licence holders only know the frequency, mode and RF output power of their transmitters, and what feeder and antenna system they are using. The input screen needs to take that into account.