

Your response

Question	Your response
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.	The proposed licence change is completely unnecessary for the amateur service. The power levels used by radio amateurs have not caused a single EMF health related issue in the past 100 years. A century of operation without any issues is proof enough that amateur radio should be exempt from this proposal. If despite the overwhelming evidence to contrary a change were made to the amateur licence then Ofcom should ensure a revised licence is consistent in its use of terminology. The current licence makes frequent reference to E.R.P. You now propose introducing E.I.R.P. if you do then you should change all occurrences of E.R.P. in the licence and the associated IR-2028 adjusting the power level according so it is consistent throughout. There is no justification for using a mixture of ERP and EIRP.
Question 2: Please provide feedback on the additions and clarifications to our 'Guidance on EMF Compliance and Enforcement', giving reasons for your response.	Given the temporary nature of amateur portable operation, frequently just a few hours, all portable operation should be exempt from any requirements that might apply to permanent installations. Your proposal requires the conditions are to be met "in any area that is accessible to the general public." This is excessive and should only apply to areas where the general public is actually present. Members of the same household as the radio amateur and members of the general public who voluntarily choose to visit an amateur station should not be subject to

	any greater EMF restrictions than the amateur station operator.
Question 3: Please provide feedback on the trial version of our EMF calculator, giving reasons for your response.	The calculator says "Calculation of the safe separation distance" This implies anything less than that distance is Unsafe – this is plainly false as such distances are still perfectly safe. The misleading word "safe" should be completely removed from the Calculator and any supporting documentation / licence conditions. The distances given by the calculator are far in excess of any rational figure. Putting in figures for a 1 watt EIRP 4G phone of 750 MHz would suggest the phone should be held 30 cm away from you – this is clearly nonsense.