

## 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>Confidential? – N</p> <p>Yaesu UK supports that all radio users need to be aware of the risks of EMF exposure, and of the ways to lessen those risks.</p> <p>Yaesu UK does not agree with Ofcom’s proposals to implement that principle by adding a major new enforceable condition to all radio user’s licences. This would be:</p> <p>Against of statutory general duties, The Communications Act 2003 and the Wireless Telegraphy Act 2006 together that require that regulations made by Ofcom:</p> <p>Are justified and proportional to the risks involved, and action is only targeted to situations where intervention is required.</p> <p>Should not require unnecessary regulation which may be dealt with elsewhere.</p> <p>Amateur Radio Operators already have a requirement in their licenses regarding consideration of the safety of Radio Frequency Radiation that goes back decades and is proportional to the low risk of Amateur Radio operation.</p> <p>All our customers in Amateur Radio, Airband, Marine markets use their radios for communication and not broadcasting, and therefore will not be operating at 100% transmit duty cycle. Typical operation duty cycle is 5% transmit, 5% receive and 90% standby. This operation style significantly reduces any EMF exposure.</p> <p>We currently print in our operating manual guidance on how to comply with FCC EMF requirements.</p> <p>There will be great concerns for the potential impact on sales and level of operation for Amateur, Marine and Airband radios.</p> <p>In the case of Marine VHF use it could cause users to only use Handheld VHF radios rather</p>

	<p>the Fixed radios impacting their ability to make a lifesaving distress call.</p>
<p><b>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?</b></p>	<p>Confidential? – N</p> <p>a) Yaesu UK supports the application of ICNIRP 2020 Guidelines but only where it is appropriate and proportionate to the type of radio user. There are concerns in the manner of how this can be achieved.</p> <p>b) There is a lack clarity on what is meant by power in respect of EMF compliance and how it is to be measured, with no differentiation of operating mode, transmission frequency, duty cycle between transmission, reception and standby by times and antenna heights, gains and location.</p> <p>There is no information provided on radio operation from other locations such as mobile in a vehicle, portable, temporary locations, from a vessel or from an aircraft.</p>
<p><b>Do you agree with our proposed guidance on EMF compliance and enforcement? Please explain the reasons for your response.</b></p>	<p>Confidential? – N</p> <p>Yaesu UK cannot agree.</p> <p>There is greater emphasis on enforcement and subsequent penalties rather than providing helpful advice to all communication radio users.</p> <p>It is not clear how an Airband, Amateur Radio or Marine VHF Radio installation can be inspected satisfactorily in accordance with EMF compliance.</p> <p>Due to the inherent low duty cycle of 2-way radio communication equipment it should be more than sufficient to including operating guidelines in manual with respect to EMF Safety.</p>