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What do you want Ofcom to keep confidential?

Keep nothing confidential

Additional comments:

Further the Bio Electromagnetic Research Initiative calls upon OFCOM to withdraw their proposal for a 3G Signal Power Increase and immediately reduce all Mobile Phone signal levels to outdoor `ALARA'levels (as low as reasonable acceptable) under the `Precautionary Principle', to encourage fixed-line telephony within buildings, encourage investment in fibre optics and the new eco friendly alternatives such as `Visible Light Communication' (VLC)and thus reduce the overall microwave load on the UK population -NOT increase it.

At a time when the emergence of a new much faster, more secure, more carbon friendly and most important more `bio-compatible' technology such as VLC (see www.bemri.org for the VLC PPP) is around the corner, we must support it instead of increasing electromagnetic pollution even further.

Question 1: Are there any reasonable grounds why Ofcom should not grant the request to vary the five Wireless Telegraphy Third Generation Mobile Licences by increasing the permitted maximum in-band EIRP to 68dBm as soon as practicable? If so, please explain your reasoning for this:

BEMRI believe that Ofcom should not grant this request. With OFCOM's Proposed Power Boost, the UK population will be subjected to significantly more damaging microwave radiation - at a time when other countries are reducing their exposure limits.The European Environment Agency are taking the research evidence seriously and are calling for exposures to be reduced, citing the BioInitiative Report, a review of over 2000 studies (<http://www.bioinitiative.org/report>).

The number of people affected by electromagnetic pollution has risen sharply. Whilst

Sweden recognises EHS as a Disability, the UK continues to ignore it.

Although we are aware that OFCOM is not in the position to consider health aspects , we ask for the UK Health Protection Agency(HPA) to be involved in this consultation and to answer the question WHY their advise so far differs from that of the EU Agency `before' OFCOM makes a decision which will affect public health. Not doing so would amount to an infringement of Human Rights.

In a recent survey by the Department of Epidemiology and International Public Health, School of Public Health, University of Bielefeld/Germany, a third of German GPs associate electromagnetic pollution with health complaints. As so far the HPA has not considered such a survey, they are not in a position to rule out serious health effects from rising electromagnetic pollution.

At a time when there is ever increasing evidence that already existing levels of electromagnetic pollution pose a threat to human health and the environment , no further increase should be permitted UNTIL these questions have been answered. No pharmaceutical drug would be allowed to enter the market until such time as sufficient tests have been done. This has not been the case here. The research so far has NOT shown that `present' levels are safe. ICNIRP does not consider athermal effects and therefore is not relevant with regards to the health effects reported in many International studies at levels far below ICNIRP standards..

The constant referral to ICNIRP standards is misleading. The government's refusal to re-evaluate UK's safety limits was demonstrated when they ignored advise from SAGE, an expert group, partly sponsored by the UK government and set up to consider the precautionary approach for buildings under powerlines. SAGE's advise on new safety limits regarding magnetic field exposure was 0.4microtesla, in drastic contrast to ICNIRP's 100microTesla. Had the government acted on SAGE's recommendation, all ICNIRP advise would now have to be revised.

The jury is still out on the recent drastic decline of the honeybee in the UK, which just has been reported to be the highest in Europe. The existing thorough scientific research, connecting the disappearance of bees and birds with electromagnetic pollution as well as its effect on plant life, is listed on www.bemri.org.

Increasing present levels without further research into this subject could spell disaster for all wildlife.

Question 2: Are there any reasonable grounds why Ofcom should not also apply the increased permitted maximum in-band EIRP to future 2 GHz MSS/CGC licences? If so, please explain your reasoning for this:

BEMRI see no reason why these should not be restricted to the same signal levels as for the current 3G operators, and for the same reasons as we gave in Question1