

**Title:**

Dr

**Forename:**

Grahame

**Surname:**

Blackwell

**Representing:**

Self

**What do you want Ofcom to keep confidential?**

Keep nothing confidential

**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:**

Yes.

I should like to submit two grounds for not granting this request:

(1) It is totally contrary to current attitudes and policies, both national and international, in respect of energy conservation. At a time when the public and industry are being required to practice energy conservation measures, from use of low-energy cfl light bulbs to closing household curtains early to conserve warmth (advice from the Prime Minister) it is nonsensical for a major radiating industry to jack up by a substantial factor the amount of energy that it is constantly dissipating into the atmosphere and the environment. It might be justifiable commercially if a clear case could be made for the need for such an increase, but no such case has even been put forward ? let alone investigated by Ofcom, as would appear to be the responsibility of that body. The argument appears to be based either on a need for competitive advantage or to overcome technical inefficiencies ? since this request has been received from one operator and other operators do not appear to have raised concerns on this issue and can therefore be assumed to be operating satisfactorily at the present level. If the former applies then the present level playing field would seem to be as acceptable commercially as any new across-the-board increased level; if the latter applies then it is for Vodafone to sort out any inefficiencies in their engineering practices rather than increase power output ? with its attendant detrimental effects in respect of the future of our planet. In respect specifically of ?better in-building penetration?, simply ramping up the power to punch through walls is a disturbingly low-tech ?solution? for any operator to be advocating: it requires increased power not only from base stations but also from handsets. Given recent developments in pico- and femto-cells, using such a sledgehammer to crack this particular nut is totally irresponsible ecologically ? which should surely be a significant consideration for a regulatory body such as Ofcom.

(2) There is significant quality peer-reviewed scientific evidence of potential health hazard from this type of radiation. It is often, totally incorrectly, stated that there is ?no evidence? of

such a hazard; such a statement shows poor understanding of the English language. Every published peer-reviewed study indicating a potential health hazard is 'evidence' and there are very many such studies. The point at issue is surely whether there is sufficient evidence of such quality as to constitute 'proof' (the term 'no proof' is also meaningless, since something is either proved or it is not). Where there is substantial evidence but not (yet) proof then there is a strong case for exercising caution: this is exactly the situation here. Just by way of illustration, the Bioinitiative Report, compiled by a substantial number of scientists (as well as others) with national and international reputations in this field including at least three former presidents of the Bioelectromagnetics Society, the top international learned society for EMF health research lists over 2,000 research papers, surely a very substantial body of evidence by any standards. To simply acquiesce to Vodafone's request to ramp up their power output in the face of such evidence is, again, surely totally irresponsible particularly since no clear need has been demonstrated.

**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:**

Yes.

Grounds as for Question 1.