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

Keep nothing confidential

**Additional comments:**

We are PAMT (Precautionary Approach to Microwave Technologies): a group of concerned parents, grandparents and local residents who, having undertaken considerable research into the area of microwave technology, are committed to protecting the health of children and families by removing the use of Wi-Fi from schools and preventing the proliferation of mobile phone masts around the area.

**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.:**

1. It should not be permitted as it is unsafe

A key point to be understood at the outset is any reference to 'safe' limits within current thinking is now widely regarded as outdated. Your statement at 3.9 below outlining Ofcom's stance does not reflect this, and in many ways invalidates much of the value of this consultation for members of the public who will be impacted on the outcome of any decision making as a result:

It will remain a requirement for all installations to comply with the maximum permitted emission levels set by the International Committee for Non-Ionising Radiation Protection (ICNIRP). Ofcom's measurement of representative samples of cellular base stations has demonstrated that, even in the vicinity of cellular masts, measurements are consistently found to be below, and in the majority of cases very significantly below, these levels. The size of

power increase being proposed in this consultation is unlikely to affect significantly this position in relation to ICNIRP.?

The Bioinitiative report (2007) was written by 14 (fourteen) scientists who are all members of the Scientific Community, as well as public health and public policy experts to document the full spectrum of scientific evidence on electromagnetic fields. Another dozen outside reviewers have looked at and refined the Report. Widely accepted as a thorough and informed piece of research, one of its key findings is:

?No positive assertion of safety can be made by governments that continue to support and enforce exposure limits for RF and ELF based on ICNIRP or IEEE criteria (or the equivalent). Governments that are considering proposals to relax existing RF and ELF standards should reject these proposals given the weight of scientific evidence that is available; and the clear disconnect between existing public safety limits and their responsibility to provide safe and healthful living environments for all segments of affected populations.?

It is also important to note that The European Parliament adopted the Bio-Initiative Report in a resolution of 4th September 2008. The resolution stated that:

?The limits on exposure to electromagnetic fields (EMFs) which have been set for the public are obsolete.?

In a very recent decision, on 2 April 2009 the European Parliament adopted a further resolution on health concerns associated with this type of technology which include the following.

It ?urges the Commission to review the scientific basis and adequacy of the EMF limits?.

2. It should not be permitted as it puts the most vulnerable at greater risk.

There have been no long term studies that take into account the latency period of the types of cancers and diseases that may be associated with RF/MW exposure to children. The rapid deployment of mobile technology and RF exposure has bypassed the scientific ability to calculate long term risk to children. The European Parliament voted in September 2008 by a very large majority to recommend tighter safety standards for mobile phones and other wireless technology particularly to protect vulnerable groups like children. It points out in particular the need to "address vulnerable groups such as pregnant women, newborn babies and children".

Ofcom have a duty to protect the child by doing everything to minimize exposure to electromagnetic pollution directly surrounding and within the school environment from the impact of mobile ?phone mast exposure and minimise any potential of harm to the child?s health and wellbeing, at present and in the future.

Once again, the BioInitiative Report (2007) states:

?The consequence of prolonged exposures to children, whose nervous systems continue to develop until late adolescence, is unknown at this time. This could have serious implications to adult health and functioning in society if years of exposure of the young to both ELF and RF result in diminished capacity for thinking, judgment, memory, learning, and control over behavior.?

This is not unique to the UK; other national Regulators have listened to growing research and adopted a more precautionary approach as advocated by the Stewart Report in 2000.

‘We conclude therefore that it is not possible at present to say that exposure to RF radiation, even at levels below guidelines, is totally without potential adverse health effects, and that gaps in knowledge are sufficient to justify a precautionary approach.’

For example, the Russian National Committee on Non-Ionizing Radiation Protection, published a paper in April 2008 titled ‘Children and Mobile Phones: The Health of the Following Generations is in Danger’

‘The members of the Russian National Committee on Non-Ionizing Radiation Protection emphasize ultimate urgency to defend children’s health from the influence of the EMF of the mobile communication systems. We appeal to the government authorities, to the entire society to pay closest attention to this coming threat and to take adequate measures in order to prevent negative consequence to the future generation’s health...Potential risk for children’s health is very high. It is our professional obligation not to damage children’s health by inactivity’

In France (2009) 238 cities and towns have volunteered to take part in a reduction in the emitted radiation from mobile ‘phone mast to 0.6V/m. The commitment from the French authorities and mast operators along with the number of towns who were prepared to commit to this programme reflects a growing awareness of local and national politicians of the health problems caused by the proliferation of antennas and mast throughout towns.

In 2009 in Spain a Council of a major suburb southwest of Madrid (Leganes) approved a new motion to regulate mobile phone antennae and declared that the emission from the antennas should be determined according to the ‘European standard’ on which the ruling is based with maximum peak density of 0.6V/m.

3. It should not be permitted as the consultation fails to take sufficient consideration of the health impacts.

The consultation for this change appears to be one based on a technical debate for the need to increase power across the 2G and 3G bands: not about whether it is right or reasonable to do so. This may explain why such a key issue has been consulted on through a restrictive route, and not widely or effectively put in the public domain.

If the public were better informed and made aware of what the implications were in terms of exposure from a potential increase from 62Dbm to 68Dbm, then the findings and feedback would be richer and more reflective of the wider community. As it stands, this consultation exercise lacks the rigour to be considered effective: even the most basic test would find the scope and focus lacking. It fails to prove how it is hearing the views of those who might be affected by changes to policy or new legislation.

4. It should not be permitted as it fundamentally challenges a person’s right to life.

In light of the above, do you think consideration beyond the commercial and technical pro and cons of an increase in power have a place in this discussion: whether people have the right not to be exposed to level of RF radiation which may cause them harm in both the short and long term.

A person has the right to have their life protected by law. As you may be aware, in certain cases, Article 2 may impose a duty on the state to take positive steps to protect citizen's lives where it is being threatened. So where there is an environmental hazard that poses a very high risk to the life of the people living nearby, the state may have a duty to provide information about that hazard to enable the people to take steps to protect themselves and their families. With this in mind, what information will Ofcom be publishing for UK residents to fully understand the potentially increased risk you are proposing?

**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.:**

It should not be permitted as there is no valid reason for any increase.

Paragraph 3.5 states:

?The maximum power levels in the original licences were set with reference to the radio equipment that was being developed commercially at that time. 3G standards and technology have evolved significantly since then...?

The proposal to increase power is presumably a commercial one to meet the demands of internet and other form of high demand media streaming common with 3G applications. If this assumption is accurate, the requirement to increase power levels within the older 2G network appears redundant, and limited in its future scope as older technology which is being superseded by e.g. and potentially a 4G generation of applications.

On this basis, it could be argued that there is no need to increase power at this time, unless it is a time saving measure to wrap any change in power levels within one umbrella consultation exercise. Which considering the implications across the country, is both morally wrong and socially bankrupt.