

Dear Contributor,

Thank you for participating in the public consultation of the ICNIRP draft guidelines.

Please note that it is important that ICNIRP understands exactly the points that you are making. To facilitate our task and avoid misunderstandings, please:

- be concise
- be precise
- provide supporting evidence (reference to publication, etc.) if available and helpful.

How to complete the comments table:

Please use 1 row per comment. If required, please add extra rows to the table.

This response document asks you to provide your 'comment', your 'proposed change', and the 'context' to this comment and proposed change. What is meant by these is the following:

Comment : A brief statement describing the issue that you have identified (and that you would like ICNIRP to take into account in the final version of the guidelines).

Proposed Change: A brief statement describing how you would like the document changed to account for this issue.

Context: A brief statement identifying relevant documents in support of your comment and proposed change.

Please, provide your details below as per the online form and the provision of the privacy policy

Last name, first name: SAMI, Walid	Email address: sami@ebu.ch	Affiliation (if relevant):
If you are providing these comments officially on behalf of an organization/company, please name this here: European Broadcasting Union		
<input checked="" type="checkbox"/> I hereby agree that, for the purpose of transparency, my identity (last and first names, affiliation and organization where relevant) will be displayed on the ICNIRP website after the consultation phase along with my comments. <input type="checkbox"/> I want my comments to be displayed anonymously.		

	Document (Guidelines, App A, App B)	Line Number #	Type of comment (General/ Technical/ Editorial)	Comment. Proposed change. Context.
1	Guidelines	138 and remainder of document	Editorial	The term „Power Flux Density“ rather than „Power Density“ better reflects the concept of power passing through a unit area Replace the term „power density“ by „power flux density“ (in all instances in the document)
2	Guidelines	152	Editorial	No definition is given for ‘equivalent power density’. Note also comment 1 To the end of line 154, add a definition of equivalent power density: eg. “Here, equivalent power density is that obtained from E-field or H-field levels, assuming far field conditions. See also Appendix A, section 2.3”
3	Guidelines	429-431	Technical	Using both 2010 guidance and proposed new guidance in the frequency range 100 kHz – 10 MHz. It would be very helpful for additional guidance to be given as to how to use both the documents together. Simply taking the lower reference limit leads to additional questions, see comments 4 and 5. Add additional text giving guidance on using the 2010 guidance with this new proposed guidance in the overlap frequency range.
4	Guidelines	681-682, 697-699, 718-720	Technical	Table headings are difficult to distinguish; amend to emphasise distinctions. Table 4: Reference levels for exposure to time-varying far-field electric, magnetic and electromagnetic fields, from 100 kHz to 300 GHz (unperturbed rms values): Whole Body Exposure Table 5. Reference levels for exposure to time varying far-field electric, magnetic and electromagnetic fields, from 100 kHz to 300 GHz (unperturbed rms values): Local Exposure for time intervals ≥ 6 minutes.

				<p>Table 6. Reference levels for exposure to time varying far-field electric, magnetic and electromagnetic fields, from 100 kHz to 300 GHz (unperturbed rms values): Local Exposure for time intervals ≤ 6 minutes.</p>
5	Guidelines	681-695	Technical	<p>Overlap region with 2010 Low frequency guidance: The proposed E-field reference levels are significantly higher at the lower frequencies in the range than those for the same frequencies in the 2010 guidance. Eg at 100 kHz, proposed occupational E-field reference level is 12.2 kV/m compared with 170 V/m in the 2010 guidance.</p> <p>Add text to the rationale to explain when this higher reference level can be used. For example, could the higher 2018 reference levels be used if certain controls are in place?</p>
6	Guidelines	681-695	Technical	<p>Overlap region with 2010 Low frequency guidance: There is a discontinuity at 100 kHz between the 2010 guidance (Occupational: 80 A/m) and this proposed guidance (Occupational 49 A/m).</p> <p>Add text to the rationale to explain how to interpret the discontinuity in H-field reference levels at 100 kHz.</p>
7	Guidelines	687-688, 690-692	Technical	<p>Table 4, Note 3 and Note # appear contradictory for frequencies below 400 MHz (a subset of frequencies up to 2 GHz). Does Note 3 apply only in the far field ?</p> <p>Note 3: For frequencies from 400 MHz to 2 GHz, compliance is demonstrated if either the E-field, H-field or Sinc value is within the reference levels; only one is required; similarly for frequencies up to 400 MHz when in the far field.</p>

Add further rows if needed. For this copy the above row.

8	Guidelines	769-770	Technical	<p>This explanation is not usable; specifically the phrase, „100 Vm⁻¹ at their source“ Any definition needs to clarify the following:</p> <ul style="list-style-type: none"> • What is the location at which 100 V/m is determined? • Is it rms or peak? • What happens when an antenna emits more than one frequency? <p>It does not make sense to talk about the field strength at the „source“ and the field strength will vary with location</p>
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				Specify this in terms of the power input (W); ensure it is clear how to deal with a source / antenna operating at more than one frequency.
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