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.

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

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| --- | --- | --- |
| Last name, first name: Wood, Mike | Email address: Your email address. | Affiliation (if relevant): Chairman - International Electrotechnical Commission (IEC) TC106 |
| If you are providing these comments officially **on behalf** of an organization/company, please name this here: International Electrotechnical Commission (IEC) TC106 | | |
| 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.  I want my comments to be displayed anonymously. | | |

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

|  | **Document**  **(Guidelines, App A,**  **App B)** | **Line Number**  **#** | **Type of comment (General/ Technical/ Editorial)** | **Comment. Proposed change. Context.** |
| --- | --- | --- | --- | --- |
| **1** | Guidelines | 643-646 | Technical | “As a rough guide, < **λ**/2**π** m, between **λ**/2**π** and 2D2/**λ** m, and > 2D2/**λ** m from the antenna correspond approximately to the reactive near-field, radiative near-field and far-field respectively, where D and **λ** refer to antenna diameter and wavelength respectively, in meters.” “antenna diameter” is not appropriate with other types of antenna than circular aperture.  **Proposed Change**  “D“ should be the maximum linear dimension of the antenna.  Explain the context of your comment. |
| **2** | Guidelines | 646-649 | General | “However, due to a range of factors that impact on the degree to which these definitions are appropriate for application to the reference levels, input from the compliance community is required to determine which of these field types is most appropriate for a given exposure.” The former is true, but this is not due of “compliance community”.  **Proposed Change**  Delete the latter “input from the compliance community is required to determine which of these field types is most appropriate for a given exposure“.  The community has only developed assessment methods according to information from relevant industries. |
| **3** | Document ? | Line number | Technical | Although the pinna is mentioned at line 327 as a ‘Type 1‘ tissue, because of the broader tissue classification adopted in line 338-339 („head and torso“), the applicable limits seem to be those relvant to tissue ´Type 2‘.  **Proposed Change** On line 340, add the pinna to the region for which ‘Type 1‘ limits apply and change the name of the region to ‘Limbs and Pinnae‘.  The pinna is excluded by IEC compliance assessment standards because of the larger exposure limit which is typically associated to it. It is therefore relevant to avoid confusion to explicitly include the pinna in the region for which a SAR limits of 4 W/kg (general public) and 20 W/kg (occupational), applies. |
| **4** | Document ? | Line number | Technical | For some products operating simultanously at different frequencies, compliance testing will be conducted according to the basic restrictions for some bands and with respect to the reference levels for some others. The possibility to assess the total exposure in this way is not considered in Section 5.4.  **Proposed Change** To avoid misunderstanding, the possibility to sum up exposure using reference levels and basic restrictions should be mentioned within section 5.4.  For devices operating above and below 6 GHz, incident power density and SAR are, respectively, likely to be used for compliance testing. |
| **5** | Document ? | Line number | Technical | (rows 510-511) It is stated that “The exposure from any group of pulses, or subgroup  of  pulses  in  a  train,  delivered  in  t  seconds  should  not  exceed  this  threshold.”, which is applicable to the basic restrictions (Table 3) and reference levels (Table 6) for exposures <360 seconds. And e.g. in Table 3 it is stated: “Limits  must  be  met  for  all  values  of  t  <  360  seconds,  regardless  of  the  temporal  characteristics of the brief exposure itself.”  To ensure device being compliant with this requirement “for all values of t < 360 seconds”, and at any given time of transmission, would require calculating sliding average of exposure over infinite number of integration times. In practice this would be impossible to implement and to define compliance testing procedures covering infinite number of integration times.  **Proposed Change** Consider to change „all values of t < 360 seconds“ to e.g. „any pulse or pulse train characteristic for the brief exposure delivered in t < 360 seconds.” and hence delete „regardless of the temporal characteristics of the brief exposure itself“.  Explain the context of your comment. |
| **6** | Guidelines | 746 | General | 5.3.1 Contact Currents @ 5.3 Guidance  In this draft, treatment of contact currents were changed from former “reference level” issue that should be protected, to the issue of just a “guidance”. There exists inconsistency between this draft and the ICNIRP 2010 in terms of the treatment of contact currents.  **Proposed Change** There already exists reference levels for contact currents between 100 kHz to 10 MHz, in Table 5 of ICNIRP 2010. The inconsistency should be addressed.  In addition, the contents of the ICNIRP 2010 related to contact currents should be revised accodingly, in the future revision.  Insert your proposed change.  Explain the context of your comment. |
| Continue numbering | Document ? | Line number | Type of comment | Insert your comment.  Insert your proposed change.  Explain the context of your comment. |

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