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**

|  |  |  |
| --- | --- | --- |
| Last name, first name: O’Grady, Lincoln | Email address: | Affiliation (if relevant): Not relevant |
| If you are providing these comments officially **on behalf** of an organization/company, please name this here: Broadcast Australia | | |
| 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 | 192 to 200, 429 to 431, 681 to 695, 697 to 716. | Technical | Overlapping frequency range from 100kHz to 10MHz between ICNIRP LF Guideline 2010 and Draft ICNIRP RF Guideline 2018 PCD.  Insert your proposed change.  Due to the enormity of the differences, it is difficult to see why the Draft RF 2018 reference limits have been relaxed to such an extent as compared to the existing 8 year old LF Guideline 2010 reference limits. Especially with respect to RF Guideline PCD lines 429 to 431, where it specifically states the requirement to meet the LF Guideline 2010 reference limits. |
| **2** | Guidelines | 429 to 431, 681 to 695, 697 to 716. | Technical | Frequency Range 100kHz to 10MHz: There appears to be a rather large difference between the General Public/Occupational reference limits in the Draft ICNIRP RF Guideline 2018 in Tables 4 and 5, vs the General Public/Occupational reference limits in the ICNIRP LF 2010 Guideline in Tables 3 and 4.  Insert your proposed change.  Overlapping Guidelines are confusing, would it not be better to have reference limits seemless from one Guideline to the next across the frequency ranges applicable.? |
| **3** | Guidelines | 192 to 200 | General | Clarification on whether nerve stimulation is classed as a biological effect or a health affect.  Insert your proposed change.  Explain the context of your comment. |
| **4** | Document ? | Line number | Type of comment | Insert your comment.  Insert your proposed change.  Explain the context of your comment. |
| **5** | Document ? | Line number | Type of comment | Insert your comment.  Insert your proposed change.  Explain the context of your comment. |
| **6** | Document ? | Line number | Type of comment | Insert your comment.  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. |

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

And paste it here.