

The logo for Optus, consisting of the word "OPTUS" in a bold, teal, sans-serif font.

Submission in response to  
ACMA Consultation Paper

**Amendment to  
electromagnetic energy  
(EME) arrangements**

Public Version

March 2020

## OPTUS FEEDBACK

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1. Optus welcomes the opportunity to respond to the Australian Communications and Media Authority (ACMA) consultation paper on *Amendment to electromagnetic energy (EME) arrangements – Proposal to make the Radiocommunications (Electromagnetic Radiation – Human Exposure) Amendment Standard 2020 (No. 1)*.
2. The Consultation Paper sets out proposals to put appropriate supply requirements in place for devices operating above 6 GHz.
3. Optus supports the ACMA's proposal to amend ACMA Standard to adopt a technical report to ensure that devices operating above 6 GHz will be covered by device supply arrangements equivalent to that for equipment operating below 6 GHz, including placing regulatory obligations on the Australian supplier of the devices.
4. Specifically, Optus supports the ACMA proposal set out at Option 1 during the interim period until the international standard is finalised. As noted by the ACMA,  
  
*Adopting IEC TR 63170 into the ACMA Standard will give manufacturers and importers clear guidance on measurement methodologies for assessing their device against the ARPANSA limits, and place EME obligations on the Australian supplier of the devices.<sup>1</sup>*
5. This is a welcome statement. We also welcome further consultation once the international standard has been finalised and made available.

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<sup>1</sup> ACMA, 2020, Amendment to electromagnetic energy (EME) arrangements, Consultation Paper, January, p.5