

12 March 2020

The Manager  
Technical Regulation & Carrier Infrastructure Section  
Australian Communications and Media Authority  
PO Box 13112 Law Courts  
Melbourne VIC 8010



Email: [techreg@acma.gov.au](mailto:techreg@acma.gov.au)

Dear Sir/Madam,

**Re: AMTA submission to ACMA consultation on amendments to EME arrangements, IFC: 04/2020**

AMTA welcomes the opportunity to respond to the ACMA's consultation on the Amendments to EME Arrangements, IFC 04/2020, in regard to the assessment of devices operating above 6 GHz for compliance with ACMA's EME Human Exposure Standard.

AMTA supports the ACMA's preferred Option 1 to amend the human exposure standard to incorporate the technical report (IEC TR 63170:2018). AMTA has previously encouraged the adoption of IEC standards where they are available and through the involvement of member organisations has confidence that IEC TR 63170:2018 will provide the necessary guidance for suppliers about the EME requirements of devices to ensure appropriate protections for consumers in the interim until the formal standard is published in the near term.

AMTA does not support Option 2, allowing device manufactures and suppliers to adopt their own compliance test methods, because it does not provide a standard test method and would result in potentially inconsistent results that are not comparable with one another.

AMTA also supports the ACMA's proposed drafting in the draft instrument Radiocommunications (Electromagnetic Radiation – Human Exposure) Amendment Standard 2020 (No. 1) [exposure standard] as presented with the consultation paper, including the three month transition period during which there is no set measurement method.

If you have any questions in regard to this submission, please contact Ray McKenzie at [ray.mckenzie@amta.org.au](mailto:ray.mckenzie@amta.org.au) or on 0419 545 751.

Yours sincerely,

A handwritten signature in blue ink, appearing to be "Ray McKenzie", written in a cursive style.

Ray McKenzie  
**Manager**  
**Mobile Carriers Forum**  
**Australian Mobile Telecommunications Association**