



Mobile & Wireless Forum

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

Dear Sir/Madam,

IFC 04/2020 Amendments to EME arrangements

The Mobile & Wireless Forum (MWF, www.mwfai.org) is an international association of companies with an interest in mobile and wireless communications including the evolution to 5G and the Internet of Things (IoT). The MWF's members include Alcatel OneTouch, Apple, Cisco, Ericsson, Huawei, Intel, LG, Motorola Mobility, Motorola Solutions, Qualcomm, Samsung and Sony Mobile.

In relation to consultation IFC 04/2020, the MWF supports the ACMA's preferred Option 1 to amend the human exposure standard to incorporate the technical report (IEC TR 63170:2018). This option provides clear guidance for suppliers about the EME requirements of devices and provides appropriate protections for device users. We do not support Option 2 because it does not provide a defined test method and may result in confusion and inconsistent results.

The MWF would like to point out that the IEC and IEEE have convened two Joint Work Groups (JWG) to further define the definition of power density and the computation and measurement of the quantity. IEC TR 63170:2018 currently defines the normal component of power density to determine exposure but as a result of the JWG work, regulatory agencies will ultimately have the option to choose the definition of the power density metric. JWG11 are developing a new Computational methods standard to determine the Power Density of the Electromagnetic Field Associated with Human Exposure to Wireless Devices and Network Equipment, 6 GHz to 100 GHz and JWG12 are developing a new Measurement methods standard to determine the Power Density of the Electromagnetic Field Associated with Human Exposure to Wireless Devices and Network Equipment, 6 GHz to 100 GHz. JWG12 picked up the work of AHG10 in 2017 that developed TR 63170.

The MWF also supports the ACMA's proposed amendment to the Radiocommunications (Electromagnetic Radiation – Human Exposure) Amendment Standard 2020 (No. 1) [exposure standard], including the 3-month transition period from the commencement of the standard.

Whilst not part of this consultation the MWF also recommends inclusion of appropriate references to EN IEC 62209-3 Measurement procedure for the assessment of specific absorption rate of human exposure to radio frequency fields from hand-held and body-mounted wireless communication devices - Part 3: Vector measurement-based systems (Frequency range of 600 MHz to 6 GHz), along with the current references to EN 62209-1, IEC 62209-1 and EN 62209-2 and IEC 62209-2.

Yours sincerely,

Michael Milligan
Secretary General