



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

Dear Sir/Madam,

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

We welcome the opportunity to make a submission in response to the ACMA's consultation on the *Amendments to EME Arrangements, IFC 04/2020*.

We support 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 would result in confusion and inconsistent results.

We also support the ACMA's proposed drafting in the draft instrument *Radiocommunications (Electromagnetic Radiation – Human Exposure) Amendment Standard 2020 (No. 1) [exposure standard]*, including the 3 month transition period from the commencement of the standard, during which there is no set measurement method.

If you have any queries about the comments in this letter, please contact Geoffrey Gerrand on (03) 8649 7350 or by email at Geoffrey.Gerrand@team.telstra.com.

Yours sincerely

Brian Miller
Regulatory Principal
Network and Technology Regulation
Brian.Miller@team.telstra.com