



**Mobile & Wireless
Forum**

Vienna, 8 November 2017

TO:

BEREC
Programme Management
Via email

Re: Public consultation 'BEREC Work Programme 2018'

To Whom It May Concern:

The Mobile & Wireless Forum (MWF, www.mwfai.org; formerly named Mobile Manufacturers Forum, MMF) is an international non-profit association with scientific purpose of telecommunications equipment manufacturers with an interest in the safety of mobile or wireless communications.

The MWF appreciates the opportunity to comment on the BEREC draft 'Work Programme 2018', adopted at the BEREC Board meeting in Bucharest on 5/6 October 2017. Since our comment is of general nature, it would fit to paragraph 3, 14, 16 to 18 and 29 of the consultation document.

The Mobile & Wireless Forum (MWF) supports BEREC's assessment and call to focus on the implementation of the Digital Single Market.

The MWF, therefore, calls on BEREC to address the adverse impacts of arbitrarily low EMF exposure limits in its 'Work Programme 2018' and to provide the European Commission, the Council and the European Parliament with advice on harmonising European EMF exposure limits by following Council Recommendation 1999/519/EC.

The MWF noticed that the BEREC Board highlights in the 'Work Programme 2018' its "commitment to serving as a body for reflection, debate and advice for the European Parliament, the Council and the European Commission in the electronic communications field. Furthermore, BEREC would like to play an important role in further improving the consistent application of regulatory rules, to enhance its working methodology and to engage cooperatively and effectively with stakeholders."

The MWF also noticed that the first three of the five strategic priorities BEREC adopted in its draft 'Work Programme 2018' address existing challenges regarding



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connectivity and access to high capacity networks, potential bottlenecks in the distribution of digital services, and enabling 5G.

The MWF takes the opportunity to draw BEREC's attention to the EMF exposure limits applied at the national and municipal level since some of them excessively deviate from the Council Recommendation 1999/519/EC on the limitation of the exposure of the general public to EMF. While the limits recommended by the European Council are science-based, the deviating national (e.g. Belgium, Italy, Lithuania, Poland) or municipal (e.g. Paris) exposure limits are not.

Arbitrarily low EMF exposure limits caused LTE/4G roll-out delays and burdened operators with unnecessary financial cost because, e.g. about 64% of existing antenna sites were unusable for LTE rollout in Italy (source: Arbitrary radio frequency exposure limits; GSMA, 2014). Moreover, such arbitrary EMF exposure limits restrict deployment in some ways, including

1. a reduced flexibility in network deployment,
2. a reduced outdoor and in particular indoor coverage for consumer,
3. decreasing opportunities for site sharing, and
4. increasing the number of base stations needed for delivering the same level and quality of service which translates into
5. higher rollout and higher operating costs that finally burden consumers.

Telko.In, an information service about the Polish and global telecom market reported that the Polish regulator addressed the implications mentioned above at the beginning of October 2017 during the meeting of the Radio Spectrum Policy Group in Warsaw.

The article goes on that the Polish Ministry of Digitisation identified the stricter limits for exposure to electromagnetic fields as a potential barrier to the implementation of 5G as the lower limits result in smaller transmitter coverage. The Ministry of Digitisation estimates that for the high frequencies, the limits valid in Poland would mean decreasing the coverage from nearly 300 metres to about 50 metres. For the band 28 GHz, Polish standards would result in a minimum distance of a human from a transmitter ten times bigger than in countries with ICNIRP-based regulations.

Moreover, Telko.In reported that according to the regulator the current standards in Poland make it difficult to launch new radio systems in the existing locations of mobile network infrastructure. The concept of 5G means significant densification of cellular networks, which may be impossible with the currently valid public EMF exposure limits in Poland. Unfortunately, it seems that the Polish Ministry did not present any plans for amending the health standards. To the contrary and under pressure from several NGOs, the Polish Ministry has been working on a draft act on preventing the effects of excessive exposure from radio communications equipment.



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On the other hand, the proposed European Electronic Communications Code includes a recommendation to set the limits for electromagnetic exposure in line with the Council Recommendation 1999/519/EC, meaning close to ICNIRP.

The MWF, therefore, strongly recommends that BEREC addresses adverse impacts of arbitrarily low EMF exposure limits in its 'Work Programme 2018'. The MWF encourages and urges BEREC to provide the European Commission, the Council and the European Parliament with advice on harmonising European EMF exposure limits by following Council Recommendation 1999/519/EC to avoid slowing down the rollout of 5G which in turn will raise the financial burden on operators and consumers.

If BEREC needed further information about this issue, please do not hesitate to contact the MWF.

Best regards,

A handwritten signature in black ink that reads 'Thomas Barmueller'. The signature is written in a cursive style with a large initial 'T'.

Thomas Barmueller
Director Europe, Middle East and Africa

Updates:

On 1st January 2017, the Mobile Manufacturers Forum (MMF) was renamed the Mobile & Wireless Forum (MWF).

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