



**Mobile & Wireless
Forum**

Vienna, 31 October 2018

TO:

BEREC
Program Management
Via email

Re: Public consultation 'BEREC Work Programme 2019'

Dear Mr Gungl,

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 Program 2019'. Our comments are related to the 'Strategic priority 3: Enabling 5G and promoting innovation in network technologies' of the consultation document. This strategic priority is based on BEREC's work on 5G as outlined in the Work Program 2018 on which the MWF also commented.

In line with our previous comments, the MWF continues to call on BEREC to address the adverse impacts of arbitrarily low EMF exposure limits also in the 'Work Program 2019'. Science-based and harmonized EMF exposure limits are crucial for an effective and efficient roll-out of 5G infrastructure. Thus, we encourage BEREC to promote at Member States level the implementation of EMF exposure limits as laid down in Council Recommendation 1999/519/EC.

The MWF noticed that in the draft Work Program 2019 BEREC again highlights the importance of infrastructure sharing. The MWF draws BEREC's attention to the EMF exposure limits at Member States level as one of the most important determinations of infrastructure sharing. The potential of sites that can be used for infrastructure sharing is significantly reduced when a Member State applies lower EMF exposure limits than recommended in Council Recommendation 1999/519/EC.

While the limits recommended by the European Council are science-based, the reduced national (e.g. Belgium, Italy, Lithuania, Poland) or municipal (e.g. Paris) exposure limits are not. Supplement 14 to ITU-T K-series of Recommendations articulates the negative impact of RF-EMF exposure limits stricter than the ICNIRP or IEEE guidelines on 4G and 5G mobile network deployment. For example, such arbitrarily low limits caused LTE/4G roll-out delays and resulted in unjustified financial cost for operators because, e.g. about 64% of existing antenna sites were unusable



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for LTE rollout in Italy since the EMF exposure budget was already used up (source: Arbitrary radio frequency exposure limits; GSMA, 2014). Moreover, such arbitrarily low EMF exposure limits restrict the deployment of mobile networks in various 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.

The proposed European Electronic Communications Code does not only provide BEREC with a stronger basis for decision-making but also includes in the provision about deployment and operation of small-area wireless access points a recommendation to rely on the Council Recommendation 1999/519/EC.

The MWF, therefore, strongly recommends that BEREC monitors and addresses adverse impacts of arbitrarily low EMF exposure limits in its 'Work Program 2019' and in the implementation of it. The MWF urges BEREC to leverage on the European Electronic Communications Code and its mention of the Council Recommendation 1999/519/EC to avoid slowing down the rollout of 5G which will raise the financial burden on mobile operators and consumers.

If BEREC needs 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'.

Thomas Barmueller
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