



TELECOMMUNICATION ASSOCIATION OF THE UK WATER INDUSTRY

Supported by
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RESPONSE TO OFCOM'S CONSULTATION On PROPOSED MEASURES TO REQUIRE COMPLIANCE WITH INTERNATIONAL GUIDELINES FOR LIMITING EXPOSURE TO ELECTROMAGNETIC FIELDS (EMF)

INTRODUCTION

This response is provided by the Telecommunications Association of the UK Water Industry (TAUWI) on behalf of its members:

Anglian Water Services Ltd	Severn Trent Water Ltd
Black Sluice Internal Drainage Board	South Staffordshire Water
Bournemouth Water	South West Water Services Ltd
Bristol Water	States of Jersey
Cambridge Water	Sutton & East Surrey Water plc
Dee Valley Water plc	Thames Water Utilities Ltd
Environment Agency	United Utilities Water plc
Essex & Suffolk Water	Affinity Water
Hartlepool Water	Wessex Water Services Ltd
Lindsey Marsh Drainage Board	Yorkshire Water Services Ltd
Welsh Water	Natural Resources Wales
Northern Ireland Water Ltd	Northumbrian Water Ltd
Scottish Water	



The Association was formed in 2004, replacing the Telecommunications Advisory Committee (TAC) which for the previous 14 years had acted as the focus for the UK Water Industry in relation to fixed and mobile communications and scanning telemetry from a technical and regulatory aspect. Over time, the scope of TAUWI has been extended to ensure its members are able to capitalise on any new opportunities resulting from emerging technologies and regulatory changes. TAUWI is chaired by Mr Bob Ward of United Utilities Ltd.

Atkins Ltd act as the main point of contact for TAUWI members and represent their interests on a range of matters, including responding to strategic consultation documents on behalf of its members.

This response has been circulated for review by each of the member organisations that form TAUWI, and further to this submission, members may respond individually with their own views on the consultation.

Question 1: Do you agree with our proposal to take steps to mitigate risks related to EMF and be in a position to hold licensees, installers and users to account if issues are identified? Please explain the reasons for your response.

Answer:

TAUWI agrees with the proposal by Ofcom to take steps to mitigate the risk of exceeding the ICNIRP EMF reference levels for exposure by the General Public.

By introducing this new condition, Ofcom will be aligning with Local Planning Department conditions concerning the installation of telecommunications apparatus and the need to declare compliance with the requirements of the radio frequency (RF) public exposure guidelines. At the same time the new condition will ensure that for those developments which, for one reason or another, do not require planning permission will also be required to demonstrate compliance.

Question 2: Do you agree with our proposal (a) to include a condition in spectrum authorisations requiring compliance with the basic restrictions for general public exposure identified in the ICNIRP Guidelines; and (b) that this condition should apply to equipment that can operate at powers greater than 10 Watts?

Answer:

TAUWI agrees with the proposal by Ofcom to (a) include a condition in spectrum authorisations requiring compliance with the basic restrictions for general public exposure identified in the ICNIRP Guidelines. With reference to (b), We understand that the condition will apply to licences that authorise transmission powers of > 10W EIRP and to licence exempt equipment that is capable of transmitting powers > 10W EIRP.



Question 3: Do you agree with our proposed guidance on EMF compliance and enforcement? Please explain the reasons for your response.

Answer:

Yes, in principal, TAUWI agrees with the general principals governing EMF compliance and enforcement. however as with any organisation, TAUWI and its members will need to understand the impact this may have in terms of time, effort and costs to put the necessary processes in place to ensure compliance.

The Water Industry is a major user of Telemetry Systems and TAUWI members employ licensed UHF Scanning Telemetry to support mission critical operations. In general, these systems operate in point to multipoint mode, consisting of a Scanning Radio Base Station and associated radio outstations. These systems operate in half duplex, with radio outstations only transmitting, when addressed to do so. Under these operating conditions, the duty cycle of these radio systems needs to be taken into consideration when calculating exposure levels.

In consideration of Shared Sites, section A2.13, we believe that the radio site owner also needs to be involved in discussions regarding the various processes that need to be followed to ensure a shared site remains compliant with the basic restrictions.

Lawrence Mears
Atkins Ltd