



Submission in response to
ACMA Consultation Paper

**Incorporating a new
ARPANSA protection
standard into the
ACMA's regulatory
arrangements**

Public Version

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OPTUS FEEDBACK

1. Optus welcomes the opportunity to respond to the Australian Communications and Media Authority (ACMA) consultation paper on *Incorporating a new ARPANSA protection standard into the ACMA's regulatory arrangements*.
2. Given the increased reliance on the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) role on providing guidance on exposure limits to radiofrequency electromagnetic energy (EME) from equipment and facilities, the Consultation Paper sets out proposals to amend the ACMA's legislative instruments to:
 - (a) Incorporate references to the new ARPANSA Standard into the General Equipment Rules and licensing instruments;
 - (b) Update or add references to international standards where applicable; and
 - (c) Streamline the existing set of regulatory instruments by consolidating the existing EME-related standard and labelling notice into the General Equipment Rules.
3. Specifically, the current proposals relate to the new ARPANSA Standard published in February 2021.¹ This replaces the previous ARPANSA Standard published in 2002.
4. While these changes are largely administrative, Optus acknowledges that this should not result in a material change to the operation of the ACMA's current EME regulatory arrangements. In addition, Optus supports the suggestions raised in the Australian Mobile Telecommunications Association (AMTA) submission being considered.

Proposed changes to ACMA's EME regulatory arrangements

5. Optus acknowledges the intent of the proposed changes to streamline the incorporation of EME regulations made by the ARPANSA into the ACMA regulatory arrangements. By capturing all relevant EME regulations in one general set of instruments, this should make the updates of relevant instruments more streamlined in the future.
6. The proposals will incorporate references to the new ARPANSA Standard and include:
 - (a) Updating the General Equipment Rules to:
 - (i) Include the requirements of both the Exposure Standard and the EME Labelling Notice with updated Advisory Note into the rules;
 - (ii) Remove reference to two international standards that set out measurement methods that have been withdrawn and replace those standards with a new consolidated international standard; and
 - (iii) Add three additional international/Australian standards that set out alternative measurement and assessment methods as means to test compliance with the requirements of the new ARPANSA Standard; and

¹ See: Radiation Protection Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz to 300 GHz (2021), <https://www.arpansa.gov.au/regulation-and-licensing/regulatory-publications/radiation-protection-series/codes-and-standards/rpss-1>.

- (iv) Update the assessment method frequency ranges to align with the new ARPANSA Standard.
 - (b) Amending the Apparatus Licence Condition Determination (Apparatus LCD) to update its EME arrangements by referencing the amended General Equipment Rules where applicable;
 - (c) Amending the Body Scanners Class Licence to reflect references to the new ARPANSA Standard; and
 - (d) Reflecting the amended General Equipment Rules in the form of consequential amendments across four specified ACMA legislative instruments.
7. A key change in the new ARPANSA Standard has been the removal of Schedule 5 which previously provided information about compliance of mobile or portable transmitting equipment (operating between 100 kHz to 300 GHz). This has now been removed and replaced with an Advisory Note to give it similar effect.
 8. Optus also agrees the removal and addition of measurement and assessment methods will continue to give guidance on the relevant standards that must be used to determine the exposure limits for emissions from mobile stations with integral antennas. These enable a supplier to measure the specific absorption rate (SAR), or the strength of radiofrequency fields associated with a device.
 9. In summary, the proposed changes to the assessment methods for devices used the General Equipment Rules are set out (in red) in the tables below.

Table 1 Measurement methods for devices used < 20 cm from the human body.

Devices used	Frequency bands	Test method standard
Proposed General Equipment Rules		
In close proximity to the human ear	300 MHz to 6 GHz	EN 62209-1 / EN 62209-1
In close proximity to the human body (< 20 cm)	30 MHz to 6 GHz	EN 62209-2 / EN 62209-2
In close proximity to the human ear or head or 20 cm or less from the human body	4 MHz to 10 GHz	IEC/IEEE 62209-1528
	600 MHz to 6 GHz	IEC 62209-3
	6 GHz to 100 GHz	IEC TR 63170 / SA TR IEC 63170

Source: ACMA

Table 2 Measurement methods for devices used > 20 cm from the human body.

Devices used	Frequency bands	Test method standard
Proposed General Equipment Rules		
More than 20 cm from the human body	100 kHz to 100 GHz 300 kHz to 100 GHz	AS/NZS 2772.2
	100 kHz to 100 GHz	IEEE C95.3

Source: ACMA

10. Optus acknowledges the proposed changes and supports the suggestions raised in the AMTA submission being reflected.