



Mobile & Wireless Forum

23 August 2021

The Manager
Infrastructure and Equipment Safeguards Section
Australian Communications and Media Authority
PO Box 13112 Law Courts
Melbourne VIC 8010

By email: techreg@acma.gov.au

Dear Sir/Madam,

Re: Incorporating a new ARPANSA protection standard into regulatory arrangements - consultation 28/2021

The Mobile & Wireless Forum (MWF, www.mwfai.org) is an international association of companies with an interest in mobile and wireless communications including the evolution to 5G and the Internet of Things (IoT). The MWF's members include Alcatel OneTouch, Apple, Cisco, Ericsson, Huawei, Intel, LG, Motorola Mobility, Motorola Solutions, Qualcomm, Samsung and Sony Mobile.

While MWF supports the intent of the proposed instruments and the submission made by the Australian Mobile Telecommunications Association (AMTA). In addition, we would like to submit the following comment:

Draft Amendments to Radiocommunications Equipment (General) Rules 2021 – EME changes

In the Table within Part 3, Schedule 4 of the above-mentioned Rules, item no. 2 "Manner of use" explicitly excludes EN 62209-2 for wireless devices operated "in close proximity to the human ear or human head" (emphasis added).

This could create some confusion as the reference to "human head" may also be interpreted as applying to devices operated in front of the face, meaning that the standard EN 62209-2 cannot be applied to devices operated in this manner. However, EN 62209-2 and IEC/IEEE 62209-1528 define the same test method for wireless devices operated in front of the face.

The MWF suggests clarifying this aspect in a footnote to Item no. 2, stating explicitly that EN 62209-2 methods are applicable to devices operated in front of the face - or alternatively - delete "or human head" in Item 2 - "Manner of use".

Please don't hesitate to contact me if you would like to discuss or clarify any aspect of this submission.

Yours sincerely,

Michael Milligan
Secretary General