



23 August 2021

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

Email: [techreg@acma.gov.au](mailto:techreg@acma.gov.au)

Dear Sir/Madam,

**Telstra submission to ACMA consultation on Incorporating a new ARPANSA protection standard into regulatory arrangements, consultation IFC 28/2021**

We welcome the opportunity to make a submission in response to the ACMA's consultation on *Incorporating a new ARPANSA protection standard into regulatory arrangements*, IFC 28/2021.

Telstra supports the ACMA's proposals for the adoption of the new ARPANSA RPS S-1 standard into the various EME regulatory arrangements. We commend the ACMA for its comprehensive consideration of all references to the former ARPANSA standard and existing assessment methods across all the relevant instruments, and then updating them to align with the new ARPANSA standard and assessment methods.

The AMTA submission to this consultation identifies three improvements in the incorporation of the new ARPANSA standard:

- A change to the referencing of compliance assessment standards to reference section 4 of the new ARPANSA standard rather than sections 2 and 3;
- A change to compliance based on field strength and power flux density to align with the new ARPANSA standard; and
- A change to the definition of types of RF worker.

We support each of these improvements.

As a network operator required to assess EME compliance, we would like to underscore the importance of the first item in AMTA's submission related to the reference of **compliance assessment standards**.



As the first item in AMTA's submission observes, the amendment proposed in Section 8 of Schedule 1 of the draft proposed Amendment Instrument amends Subsection 10(3) of the Apparatus LCD such that it refers to sections 2 and 3 of the ARPANSA standard. We agree with AMTA's assessment that these sections of the ARPANSA standard do not directly reference the methods to verify compliance with the basic restrictions and reference levels. We also agree with AMTA's proposed drafting for the Apparatus LCD, which references section 4 of the new ARPANSA standard explicitly. This is important to Telstra, as section 4 directly specifies the methods for determining **compliance** with the Apparatus LCD.

Yours sincerely,

Geoffrey Gerrand  
Regulatory Principal  
Network and Technology Regulation  
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