

Public Consultation Template - ICNIRP Draft RF Guidelines, Appendix A, Appendix B

Comments to be uploaded until 9.10.2018

Dear Contributor,

Thank you for participating in the public consultation of the ICNIRP draft guidelines.

Please note that it is important that ICNIRP understands exactly the points that you are making. To facilitate our task and avoid misunderstandings, please:

- be concise
- be precise
- provide supporting evidence (reference to publication, etc.) if available and helpful.

How to complete the comments table:

Please use 1 row per comment. If required, please add extra rows to the table.

This response document asks you to provide your 'comment', your 'proposed change', and the 'context' to this comment and proposed change. What is meant by these is the following:

Comment: A brief statement describing the issue that you have identified (and that you would like ICNIRP to take into account in the final version of the guidelines).

Proposed Change: A brief statement describing how you would like the document changed to account for this issue.

Context: A brief statement identifying relevant documents in support of your comment and proposed change.

Please, provide your details below as per the online form and the provision of the privacy policy

Last name, first name: Duvdevany, Amnon	Email address:	Affiliation (if relevant): Tnuda - The Israeli National Information Center for Non-Ionizing Radiation; IEEE C95.1 WG; The Israel Institute for Occupational Safety and Hygiene; IDF Medical Corps Headquarters			
If you are providing these comments officially on behalf Center for Non-Ionizing Radiation	of an organization/company, please name this h	nere: Tnuda - The Israeli National Information			
☑ I hereby agree that, for the purpose of transparency, my identity (last and first names, affiliation and organization where relevant) will be displayed on the ICNIRP website after the consultation phase along with my comments.					
\square I want my comments to be displayed anonymously.					



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	Document (Guidelines, App A, App B)	Line Number #	Type of comment (General/ Technical/ Editorial)	Comment. Proposed change. Context.
1	Guidelines	84	Technical	Considering using "generally" before "healthy adults" Adding "generally" Generally healthy
2	Guidelines	117	Technical	Considering adding diffraction Adding diffraction Another physical phenomena which occours at waves propagation
3	Guidelines	156	Technical	H _{inc} is missing Adding H _{inc} Missing quantity
4	Guidelines	157	Editorial	Par. 4.2 is missing Adding par. 4.2 Missing number
5	Guidelines	602	Technical	"Tailoring" to table 2 issue at 360 (or closer) seconds, for limbs (OK for head and trunk) "Tailoring" to table 2 issue at 360 (or closer) seconds, for limbs (OK for head and trunk) "Tailoring" needed
6	Guidelines	619	Technical	Energy density is missing Adding energy density Missing quantity



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7	Guidelines	,697 718	Technical	"Tailoring issue" (which may omit using the tables for local exposure relaxation) to table 3 at 100kHz-400MHz (using 6/30 minutes averaging time), since it is not clear how "local exposure" is defined.
				Tailoring needed Tailoring needed

8	Guidelines	709	Editorial	66 GHz should be 6 GHz. 6 GHz. An error
9	Guidelines	general	Technical	There are no clear demands of using also the LF limitations at mutual frequencies (100 kHz- 10 MHz). It is advised writing this explicitly at all relevant tables as well. The users should be guided to choose the stricter limitations between the guidelines (according to the exposure characteristics and different demands by both guidelines, e.g. different time averaging). There are no clear demands of using also the LF limitations at mutual frequencies (100 kHz- 10 MHz). It is advised writing this explicitly at all relevant tables as well. The users should be guided to choose the stricter limitations between the guidelines (according to the exposure characteristics and different demands by both guidelines, e.g. different time averaging). Avoid confusion
10	Guidelines	general	Technical	Using the term OAHET more constantly/ uniformly (for the document and references). Using the term OAHET more constantly/ uniformly (for the document and references). Uniformity



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11	Appendix A	205-208	Editorial	Confusing usage of opposite ratios It is better to use "mass to surface" only (and not the opposite) Avoid confusing
12	Appendix A	291-327	Technical	No referring to 1,2 types of tissues differences, and the there is no differentiation regarding the operational thresholds (only 20 W/Kg is mentioned as an operational threshold, not 40 W/Kg). As detailed above, referring to 1,2 types of tissues differences and to 40 W/Kg Missing data
13	Appendix A	370	General	2.15 cm instead of mm. Suggesting clarifying that S_{tr} is defined at z=0 cm instead of mm, adding clarafication An error, clarafication
14	Appendix A	392-402	Editorial	The final averaging time is not written explicitly (though mentioned). Writing the final averaging time Avoid confusing
15	Appendix A	415	General	Writing explicitly "operational health effect threshold" Writing explicitly "operational health effect threshold" Clarity
16	Appendix A	427	Editorial	Longer instead of shorter Writing longer An error
17	Appendix A	767/773, 784-787	Editorial	Values/ consistency needed to be checked Values/ consistency needed to be checked Values/ consistency issue
18	Appendix B	190	Editorial	Human hearing threshold is 20 μ Pa (unless considerations of short pulses were made). 20 μ Pa An error



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Add further rows if needed. For this copy the above row.

And paste it here.