

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: DOREY, Peter	Email address:	Affiliation (if relevant): CEng, MIET
If you are providing these comments officially <b>on behalf</b> of an organization/company, please name this here: TUV SUD Product Service		
<input checked="" type="checkbox"/> I hereby agree that, for the purpose of transparency, <b>my identity (last and first names, affiliation and organization where relevant) will be displayed</b> on the ICNIRP website after the consultation phase along with my comments. <input type="checkbox"/> I want my comments to be displayed anonymously.		

	Document (Guidelines, App A, App B)	Line Number #	Type of comment (General/ Technical/ Editorial)	Comment. Proposed change. Context.
1	Guidelines	129	Editorial	Spelling error dialectric. Dialectric = Dielectric Explain the context of your comment.
2	Guidelines	156	Technical	Table 1 is missing $H_{inc}$ Add Incident Energy Density, $H_{inc}$ , $J/m^2$
3	Guidelines	697	Editorial	Table 5 entries with a negative index (power) are not clearly showing the negative sign Add a space before the negative sign. Explain the context of your comment.
4	Guidelines	718	Editorial	Table 6 entries with a negative index (power) are not clearly showing the negative sign Add a space before the negative sign. Explain the context of your comment.
5	Guidelines	707	Technical	Note 3 of Table 5 refers to Table 6, however the reference level units are dissimilar i.e. Table 5 in $W m^{-2}$ and Table 6 in $kJ m^{-2}$ . Question: Unclear how to proceed e.g. do we need to convert $kJ m^{-2}$ into $W m^{-2}$ using the 6 minute average time? If so Note 3 should explain. Alternatively specify in Note 3 that the reference level in $kJ m^{-2}$ is to be used.
6	Guidelines	709	Editorial	Note 4 text „(66-30 GHz)“ incorrect Replace with: „(6-30 GHz)“ Explain the context of your comment.
7	Guidelines	703	Technical	Note 2 of Table 5 refers to Table 4 for the frequency range 100 kHz – 400 MHz, however Table 4 does not contain reference levels in $W m^{-2}$ for the frequency range 100 kHz – 30 MHz. Suggest that Note 2 clarifies that compliance is achieved over the frequency range 100 kHz - 30 MHz by meeting the E-Field and H-field reference levels in Table 4. Explain the context of your comment.

8	Guidelines	723	Technical	<p>Note 2 of Table 6 refers to Table 5 for the frequency range 100 kHz – 400 MHz which in turn refers to Table 4. However Table 4 does not contain reference levels in <math>\text{kJ m}^{-2}</math> or <math>\text{W m}^{-2}</math> for the frequency range 100 kHz – 30 MHz.</p> <p>Suggest that Note 2 clarifies that compliance is achieved over the frequency range 100 kHz - 30 MHz by meeting the E-Field and H-field reference levels in Table 4.</p> <p>Explain the context of your comment.</p>
9	Guidelines	718	Editorial	<p>Bracket missing in Table 6 equation; column „Incident plane wave energy density...” and row; „Occupational“, „&gt;6 – 300 GHz”.</p> <p>Missing bracket underlined: <math>2.75 f^{-0.177} [2.5+1.77(t-1)^{0.5}]</math></p> <p>Explain the context of your comment.</p>
10	Guidelines	727	Technical	<p>Note 3 frequency range incomplete.</p> <p>Change: „&gt;400 MHz - 6 GHz” to „&gt;400 MHz – 300 GHz”</p> <p>Explain the context of your comment.</p>
11	Guidelines	721	Technical	<p>A note is missing for Table 6 describing range of values for „t”.</p> <p>Suggest add same note as used for Note 3 of Table 3, i.e: ‘t’ is time interval, in seconds; for <math>t &lt; 1</math>, ‘t=1’ must be used.</p> <p>Explain the context of your comment.</p>
12	Guidelines	740	Technical	<p>Table 7, General Public, Current <math>I_L</math> reference level is 45 mA whereas Appendix A Line 771 states; “ICNIRP sets the limb current reference levels at 100 mA and 20 mA, for occupational and general public exposures respectively”. The documents are therefore not consistent.</p> <p>Clarify which general public limb current is required; 45 or 20 mA?</p>
13	Appendix A	794	Technical	<p>This comment concerns the practicality of measurement of the new reference level for incident energy density <math>H_{inc}</math> described in Line 794 Clause 4.7 and used in Table 6 of the Guidelines. Appendix A Lines 103 to 104 state; “the incident energy density is derived as the temporal integration of the incident power density”. Line 105 provides the integration equation. Is it the intention that <math>H_{inc}</math> can be measured or is it intended that it is only derived computationally?</p> <p>Clarify if the reference level <math>H_{inc}</math> is intended to be measured or only computationally derived.</p>