

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: Findlay, Richard	Email address:	Affiliation (if relevant): Your affiliation
If you are providing these comments officially on behalf of an organization/company, please name this here: EMFcomp Limited		
<input checked="" type="checkbox"/> 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. <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	595	Technical	<p>The change from averaging the SAR over a contiguous region to a 10 g cube is a significant step backwards, when the dosimetry should be moving forwards. A cube, as opposed to a contiguous (connected) region, is a very poor way to represent localised SAR, particularly at higher frequencies when absorption is more surface based. I imagine the change has been made purely because averaging over a cube is easier to do, regardless of accuracy.</p> <p>Average over 10 g contiguous region</p> <p>The averaging volume should be kept the same as ICNIRP 1998</p>
2	Document ?	Line number	Type of comment	<p>Insert your comment.</p> <p>Insert your proposed change.</p> <p>Explain the context of your comment.</p>
3	Document ?	Line number	Type of comment	<p>Insert your comment.</p> <p>Insert your proposed change.</p> <p>Explain the context of your comment.</p>
4	Document ?	Line number	Type of comment	<p>Insert your comment.</p> <p>Insert your proposed change.</p> <p>Explain the context of your comment.</p>
5	Document ?	Line number	Type of comment	<p>Insert your comment.</p> <p>Insert your proposed change.</p> <p>Explain the context of your comment.</p>
6	Document ?	Line number	Type of comment	<p>Insert your comment.</p> <p>Insert your proposed change.</p> <p>Explain the context of your comment.</p>
Continue numbering	Document ?	Line number	Type of comment	<p>Insert your comment.</p> <p>Insert your proposed change.</p> <p>Explain the context of your comment.</p>

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

And paste it here.