



Mobile Manufacturers Forum

September 21, 2020

Marlene H. Dortch
Secretary Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **Notice of Ex Parte Communication**, Targeted Changes to the Commission's Rules
Regarding Human Exposure to Radiofrequency Electromagnetic Fields, ET Docket No. 19-226

Dear Ms. Dortch:

On September 17, 2020, the Mobile & Wireless Forum (MWF), on behalf of its respective members held a virtual meeting with representatives of OET. A list of attendees is set out below. The industry representatives' purposes for the meeting were to engage with OET on items of interest and concern regarding equipment authorization as well as to introduce the MWF to OET representatives unfamiliar with the association. The meeting followed the agenda and order of presentation set out in the attached slide deck. As demonstrated by the slides, much of the meeting covered items not relevant to the referenced NPRM.

With regard to the NPRM issues, MWF first pointed out that it is a global association committed to achieving as much alignment as possible with global standards – specifically IEEE and ICNIRP. To that end, MWF urged FCC to adopt an approach to time averaging that will align as much as possible with the IEEE standard and with practices in place in other jurisdictions, such as Canada. Specifically, MWF urged FCC to adopt the time averaging approach already utilized in Canada below 6 GHz – which is based on a six minute average – and to consider a similar six minute average for measurements above six GHz. MWF outlined its belief that concerns expressed by FCC about time-averaging in the NPRM involve circumstances of power spikes and may be defined as extreme cases not relevant to telecom signals. Such cases should be dealt with separately from requirements for telecom signals; if necessary, a separate NPRM on such cases could be promulgated.

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In addition, MWF advised FCC that because its currently proposed scale for averaging – from 100 seconds to 1 second – differs from that put forward in the October TCB Workshop devices designed to the October specifications will be put out of compliance. Accordingly, an adequate transition period is needed. MWF noted that this point is set out in its comments to the NPRM (submitted on June 15, 2020) where MWF recommends a twenty-four month period for transition.

Following MWF's presentation, there was discussion regarding published work by Dr. Kenneth Foster as well as other work by Dr. Neils Kuster and the extent to which their views are in conflict. There was also discussion whether the FCC should utilize the same temperature differential of 1 degree C that is used by IEEE and ICNIRP in evaluating the impact of time-averaging. MWF understands that FCC will undertake further consideration of MWF's views.

Respectfully Submitted,

/s/ Charles Eger
Charles Eger
MWF Consulting Staff

Attach: slide deck

cc: all attendees

ATTENDEES:

FCC

Electromagnetic Compatibility Division, OET

Martin Doczkat
Chrysanthos Chrysanthou
Kevin Graf
Steven Bartholomew

Policy and Rules Division, OET

Bahman Badipour
Aole Wilkinsel

Laboratory Division, OET

Ronald Williams
Jim Szeliga
Tim Harrington
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MWF

MWF Representatives

Michael Milligan
Chuck Eger

Members

Anders Berggren
Goga Bit-Babik
Dave Case
Louie Castro
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Dan Cox
Antonio Faraone
Frank Korinek

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