

The Committee Secretary
House of Representatives Standing Committee on Infrastructure and Communications
PO Box 6021
Parliament House
Canberra
ACT 2600

Dear Standing Committee members,

The Telecommunications Amendment (Enhancing Community Consultation) Bill 2011

NoTowersNearSchools is pleased to make a submission to this Inquiry. Our group welcomes any consideration of the current legislation, which is outdated and inadequate. We particularly welcome consideration of amendments that seek to enhance community consultation and protection, which is woefully disregarded under existing legislation.

We formally request the opportunity for in-person representation from **NoTowersNearSchools** before the Standing Committee to discuss our recommendations.

Our recommendations:

1. Cumulative EMR at community-sensitive sites to be less than 0.1microwatts/cm².
2. "Community-sensitive sites" to be clarified and defined in the ACIF Code.
3. The ACIF Code to be enforced through legislation.
4. Cumulative levels of EMR at sensitive sites to be regularly, independently monitored.
5. Any upgrading of facilities to be subject to the same consultation as new facilities.
6. Establishment of an effective Government regulator to ensure industry compliance with the legislation.

Background:

NoTowersNearSchools was initially formed by a group of concerned community members from the suburb of Bardon/Rainworth in September 2009. We now represent communities Australia-wide. We have continued voicing our concerns over the inappropriate siting of mobile phone towers as we believe that legislation currently governing the siting of such facilities requires urgent amendment in order for other communities not to have to endure the tumultuous and costly (time, resources and finances) battle that we have. Under the present legislation, we live in constant fear of another such proposal being lobbed onto our community and on to other communities.

Since our group's inception, **NoTowersNearSchools** has been invited to delegate a member to sit as a community representative on the ACIF Code Review and also on the EME Reference Group Panel (ARPANSA).

The battle our community went through is far from unique. We are aware that there have been more than 150 similar battles of fellow communities across Australia (see Attachment 1). Our website gets

an average three enquires per week from communities in distress. Communities are turning to our group, as they feel totally disempowered in the current regulatory environment.

Political support

In our case all levels of government (Local, State and Federal) supported our battle and all strongly requested that Telstra find an alternative acceptable location for its facility, which Telstra refused (see Attachment 2).

We are aware that many other politicians have spoken in support of their communities (see Attachment 3).

Precautionary Approach

The major concern for all communities is the future health and wellbeing of community members, particularly children, whose bodies are still growing and developing and consequently are believed to be more susceptible to absorption of radiation.

- To date, there are NO studies that have been done on children.
- There are NO conclusive longitudinal studies that have been done on the cumulative effect of EMR.
- The vast majority of studies have been done on mobile phone use – not EMR from towers.
- The vast majority of studies have been done on the thermal effects (temperature rising) on adults (over 25 years of age).
- More recent studies that have been done on non-thermal effects (biological effects at cellular level – i.e. effect on DNA of cells) indicate that cellular changes can occur at EMR levels as low as 0.1microwatts/cm².

The ACIF Code states that a precautionary approach should be taken with regard to community-sensitive sites and includes schools as an example. Despite this, the Code does not indicate what form the precautionary approach should take and, further, the Code is not enforceable by legislation. Telcos claim to “give regard to” community-sensitive sites but the reality of this is often meaningless.

Consultation:

- Presently, this is more notification rather than meaningful consultation. The telcos ensure a lease is in place before a community is informed.
- Consultation is currently not required when an existing facility is upgraded or co-location occurs.
- The ACIF Code is an industry code that is not enforceable. The current update to the ACIF Code will not protect communities. The Code needs to be enshrined in legislation before it will be effective.

Government Governance:

ACMA: In light of our experience, we believe the current regulator (ACMA) is failing the Australian public. The current complaints process is unnecessarily difficult to navigate for communities unfamiliar with the industry. This process is a quagmire of endless hurdles and most communities give up in frustration.

In the case of our community, we persevered and delivered a formal complaint to ACMA, which was finally accepted. We were then astounded by ACMA’s refusal to fully investigate our complaint and enforce penalties for non-compliance. We then wrote to ACMA CEO (Chris Chapman) outlining our concerns about ACMA’s complaints handling as well as ACMA’s wanton disregard towards community concerns, as illustrated at an industry presentation given by an ACMA representative (Geoff Hartwig) (see Attachment 4).

ACCAN: The Australian Communications Consumer Action Network purports to be the peak body for consumers. We copied ACCAN on several pieces of our correspondence (e.g. to ACMA) and we



rang to seek help directly from ACCAN in March 2010. Our call went to an answering machine where we requested a representative of ACCAN call us back.

On 9 November 2011, an ACCAN representative finally called back (**18 months after that phone message was left**). The representative wanted information from our group to include in a submission from ACCAN to the Standing Committee for which this submission has been written.

ARPANSA: In light of our experience with ARPANSA, through a submission to the EME Reference Group in 2010 and followed by representation on the Reference Group in 2011, we believe ARPANSA disregards genuine concerns of the Australian community and refuses to adopt appropriate EMR levels that ensure a precautionary approach at community-sensitive sites is achieved. Given the fact that NO research has been done on children, this technology is so new and The World Health Organization has stressed that more research must be done, surely it is time to review the current EME level. ARPANSA needs to look internationally to see the kind of precautionary, best-practice approach that is occurring overseas.

There are cities currently operating on the level of 0.1 microwatts/cm²:

- Salzburg, Austria
- Legares, Spain
- 17 cities in France (successfully trialling this level at the moment)

It is the basic expectation of all Australians that the Government will protect the future health and wellbeing of our children. If there is any doubt – and there so clearly still is – a precautionary approach is vital. Current legislation is risking the future health of Australian children.

Please contact me if you need any further details about this submission (

Yours faithfully,

SANDRA BOLAND
(On behalf of **NoTowersNearSchools**)

RAINWORTH STATE SCHOOL
PARENTS & CITIZENS' ASSOCIATION
President: Ms Sandra Boland



11 November 2010

The ACMA
PO Box Q500,
Queen Victoria Building
Sydney
NSW 1230

For the attention of the Chairman and CEO; Mr Chris Chapman

Dear Mr Chapman,

The ACMA's Perceptions of Community EMR concerns

I am writing to bring to your attention, as Chairman and CEO of the ACMA, an issue of corporate governance. I am deeply concerned that in its dealings with, and respect of communities, and community concerns with Electromagnetic Radiation (EMR), that the ACMA is seen by community groups as being arrogant, out of touch with current scientific research and dismissive of community issues.

These concerns have been raised in response to a recent community campaign that I have been involved with through the "*no towers near schools*" action group to relocate a proposed mobile phone base station away from Rainworth State School that has involved dealings with the ACMA

Further, following discussions with other communities around Australia, my concern is that this is not an isolated instance, and could reflect greater systemic failures by the ACMA, and its officers in the execution of their role as a government agency and in the provision of independent advice.

The following four examples are provided to illustrate my concerns

1. Slides used in a recent ACMA industry presentation show an EMR "monster" eating concerned community members, and appear to provide outdated information on health and other matters. Representation of community members in this way could only be construed as being patronising at best.
2. A formal complaint against Telstra's application of the ACIF industry code with respect to consultation in the planning of a low impact facility was dismissed, and not investigated.
3. An investigation by ACMA into a 10 February 2010 newspaper article alleging irregularities between a Telstra commissioned EMR report, and an independent Brisbane city council commissioned EMR report failed to address key aspects of the article or allow cross examination of information provided to ACMA by Telstra, before publishing it's conclusions
4. The removal of property references (such as house numbers) from EMR reports favours telcos by making it impossible for affected residents to be able to identify the effect of EMR on their property.



As outlined below, my concern is that the actions undertaken by the ACMA employees in this matter could indicate greater governance issues surrounding the independence and quality of advice provided to Government and communities in respect of sites selection processes for mobile phone facilities near community-sensitive locations.

Rainworth State School P&C is a not-for-profit association representing the parents and caregivers of RSS pupils, as well as local community members. The P&C works in partnership with the school administration and staff to fulfil its mission of providing support and services to enhance the care and education of our community's children. Our school is the hub of our community at Rainworth and, as such, the P&C provides an important community voice for the residents of our local neighbourhood.

The community recognise the need for mobile telephone communications in the modern digital economy and has acted in good faith and in an open and transparent manner in its dealings with Telstra and the ACMA throughout this process, and has sought to work towards achieving a mutually satisfactory outcome. The social and emotional cost in trying to achieve this over the last 12 months has been extensive, not only to the adults, but also to the children of RSS.

I am writing to you in the hope that you and your colleagues on the ACMA Board will take action to address the issues of the ACMA's performance in the matters outlined above.

I understand the ACMA is undertaking a number of public hearings through October and November as part of its reconnecting the Customer public enquiry. Hearings are an important part of the public enquiry process, as such I feel it is very remiss that Brisbane Perth and Darwin have been excluded from the programme.

I would of course welcome the opportunity to arrange a meeting for yourself and/or the Board with members of our community should you be in Brisbane in order that we can explain the depth of community feeling on this issue.

Yours sincerely,

Sandra Boland
President, Rainworth State School P&C Committee

Enc: Attachment A: - Correspondence ACMA to Telstra 04/03/10

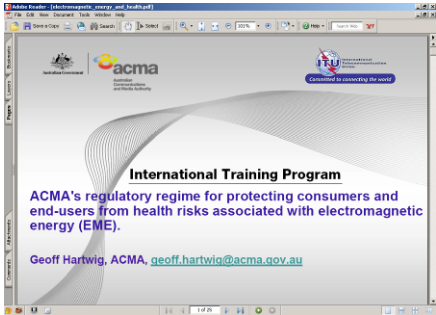
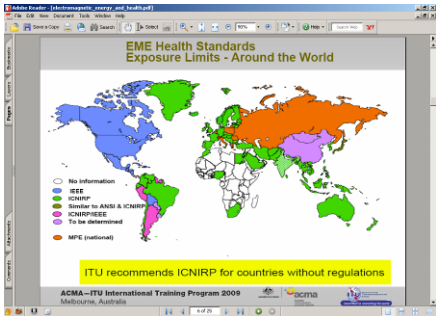
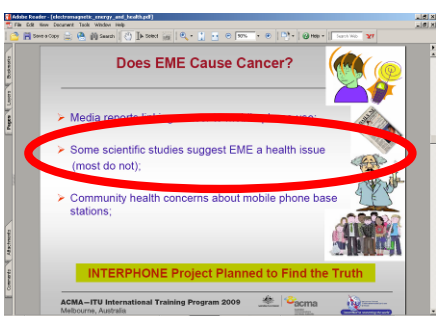
Cc: Senator Steven Conroy - DBCDE.MinReps@dbcde.gov.au
Senator Scott Ludlum - trish.cowcher@aph.gov.au
Mr Malcolm Turnbull - malcolm.Turnbull.MP@aph.gov.au
Hon Andrew Fraser MP - mount.coot-tha@parliament.qld.gov.au
Councillor Peter Matic - toowong.ward@ecn.net.au

1. EMR Monster Slides


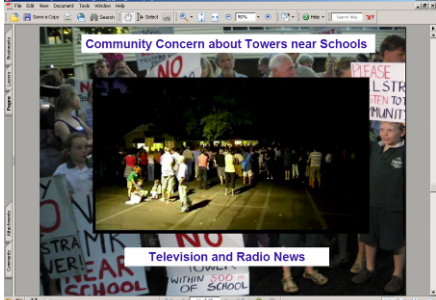

I understand the following slides were used in an presentation, by the ACMA's **Mr Geoff Hartwig**, to the International Telecommunications Union (ITU) in Melbourne in 2009.

The ACMA's position appears to be out of step with a precautionary approach being adopted by an increasing number of countries, in light of health concerns from EMR

I have provided comments about my concerns with **Mr Hartwig's** presentation, and the apparent, dismissive way it deals with community issues below

Slide	Comment
	<p>Slide 1 of 25</p> <p>The presentation was titled "ACMA's regulatory regime for protecting consumers and end users from health risks associated with Electromagnetic energy (EME)," and was delivered by Mr Geoff Hartwig of The ACMA, under the branding of the Australian Government, The ACMA and ITU</p>
	<p>Slide 6 of 25</p> <p>This slide suggests the majority of the world has EMR health standards similar to Australia, It appears to avoid the fact an increasing number of regulatory authorities are adopting a precautionary approach to setting "safe limits of EMR" approximately 1/50 of those in Australia, in light of emerging concerns about health risks (including long-term effects of EMR on children). Including 9/27 EU countries, Russia, China, Switzerland, Germany, which uses the ICNIRP guidelines, says it's important for people to reduce their exposure. France has recently commenced a trial at 0.6v/m (0.1 μW/cm²) in 238 towns (0.6v/m is the social recommended value for mobile telephony as above this level health effects can be shown).</p>
	<p>Slide 9 of 25</p> <p>Independent reports that challenge the current ACMA position appear to be discounted, including the .</p> <p>On 02 April 2009, the European Union passed a resolution¹ (559 votes for, 22 against) on health concerns associated with electromagnetic fields. The resolution stated (amongst other things), that:</p> <p>The EU "the scientific community has reached no definite conclusions but that has not prevented some national or regional governments, in China, Switzerland, and Russia, as well as in at least nine [out of 27] EU Member States, from setting what are termed "preventive" exposure limits</p>

¹ European Parliament, "European Parliament resolution of 2 April 2009 on health concerns associated with electromagnetic fields (2008/2211(INI)", <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT%2BTA%2BP6-TA-2009-0216%2B0%2BD0C%2BXML%2BV0//EN>.

	<p>Slide 13 of 25</p> <p>My research has indicated a lack of “evidence” of harmful health effects from living near mobile phone towers is due to a lack of research Telstra have also advised me “<i>there have been no longitudinal studies currently completed specifically on the exposure to children to 3G technologies</i>”.</p> <p>The American Federal communication commission recently reported “<i>reports by some health & safety interest groups have suggested that wireless device use can be linked to cancer and other illnesses. These questions have become more pressing as more and younger people are using the devices, and for longer periods of time. No scientific evidence currently establishes a definite link between wireless device use and cancer or other illnesses, but almost all parties debating the risks of using wireless devices agree that more and longer-term studies are needed. After listening to several expert witnesses, a United States Senate committee recently came to this same conclusion</i>”²</p>
	<p>Slide 15 of 25</p> <p>The “EMR monster” appeared to be delivered immediately prior to a video clip of a Telstra community consultation event at Rainworth State school, and could be seen as demeaning community concerns.</p>
	<p>Slide 16 of 25</p> <p>Following discussions with several parents, I am not aware of the ACMA obtaining permission to use images of primary school children in this manner.</p> <p>Whilst this is not illegal, I believe this to be unethical for a Government agency to use images of children without parental consent or knowledge</p> <p>At least one parent has advised me that they are unhappy with the ACMA’s use of their child’s image in this presentation</p>
	<p>Slide 20 of 25</p> <p>This slide, whilst I understand is hypothetical, to illustrate how the industry code for site selection works has caused some community stress, as the slide covers an area in Bardonia, close to Rainworth state school,</p> <p>Interestingly it does not suggest collocation as an option, even though there are existing antennas within 100meters of the “proposed suitable site”</p>

² Source: <http://www.fcc.gov/cgb/consumerfacts/mobilephone.html>

2. ACMA Failure to investigate Formal Complaint

My concerns are that the ACMA

1. Failed to investigate a breach of the industry code, for the installation of a low impact facility. Given the nature of the breaches, and similarities with other communities that have contacted me, this was seen as a test case, by this and other communities as to the application of the ACIF industry code by Telstra. Following the ACMA's decision not to investigate my complaint, there is now uncertainty as to the duty of care required by Teleco's in applying the ACIF industry code,
2. Although the complaint is recorded on the ACMA's statistics as a complaint against the code. The ACMA's failure to investigate means the application of the industry Code's processes and procedures will not be tested by the ACMA nor the findings for (or against) Telstra documented.
3. It took over 3 months for the ACMA to respond to my initial complaint, and during that time no investigation had been undertaken. Given the long time for the ACMA to not investigate my complaint, and the limited opportunities for redress under the ACIF code (The ACIF code only allows the ACMA to instruct the carrier to rerun the consultation period), had Telstra decided to proceed with their original proposal I believe it would have been installed months before the ACMA would have ruled on my complaint
4. I wrote to **Michelle Richardson** of the ACMA expressing my concerns, at this decision and requesting that the ACMA investigate my formal complaint in order to provide closure to this matter, and use this learning as part of the ACIF code review, which is currently underway. She responded that she would not investigate the complaint.

Background

The current ACIF code has a stringent complaints procedure, limited grounds for complaint, and few remedies, as such my complaint was seen by the community as a test case to test the current ACIF code claims procedures. The time taken from making a formal objection to the planned base station (16 September 2009), through to the formal complaint to Telstra (21 January 2010), Telstra's response (18 March 2010) to the ACMA's decision not to investigate (25 October 2010), exceeded 13 months. The ACMA's lack of investigation further increases my concern that the current code's complaint procedure and remedies available are not workable.

This community is working with the ComsAlliance, which is undertaking a review of the ACIF code at the moment. A number of areas of complaint are matters of precedence. The ACMA's findings following their formal investigation into the complaint were seen as a critical part of the communities input into the ACIF code review.

Following my experiences in Bardon, several other communities throughout Australia have contacted me. Discussions with these other communities have raised concerns that Bardon's experiences in the application of the ACIF code is not an isolated instance, and could reflect greater systemic failures by Telstra, and other teleco's in the application of:

1. The ACIF industry code, and
2. Best practice principles relating to community consultation and the location of mobile phone facilities near community-sensitive locations

I am deeply concerned that in its locating of low-impact facilities near community-sensitive sites, Telstra, and other Teleco's appear to be disregarding the ACIF Code on the deployment of mobile phone infrastructure, hence it is important that the ACMA investigate my formal complaint,

The following summary timeline is provided for your information

08 April 2010, following an unsatisfactory response from the carrier, a formal complaint was made to the ACMA against Telstra's proposed base station at 27 Gerler Street, Bardon. The complaint requested the ACMA direct Telstra to comply with the code, in accordance with clause 8.3.2 of the ACIF code.

The basis of the complaint to the ACMA identified the following non-compliance with the mandatory obligations under the ACIF industry code (ACIF C564:2004) Deployment of Mobile Phone Network Infrastructure (the *ACIF Code*):

- 1 Telstra's approach to applying the precautionary principles for site selection
- 2 Telstra's community consultation plan did not meet the minimum requirements of the ACIF code and consultation has not been undertaken in good faith
- 3 No evidence that Telstra has incorporated the community's view into the radio communications infrastructure site selection process (ACIF code cl 1.2.f refers)

23 June 2010 Telstra advised at a meeting between the P&C, Rainworth State School, and Queensland Department of Education they were not able to remove the 27 Gerler street proposal from the table, that is it was still the likely option should the 3 tower proposal fail to proceed.

12 July 2010 Telstra wrote to residents advising of their plan to construct an alternative, 3-tower option

19 July 2010 Ms *Michelle Richardson* of the ACMA wrote to me, advising that

"As Telstra has made new site proposals in response to community feedback on the Gerler Street proposal, I have decided not to investigate your complaint"

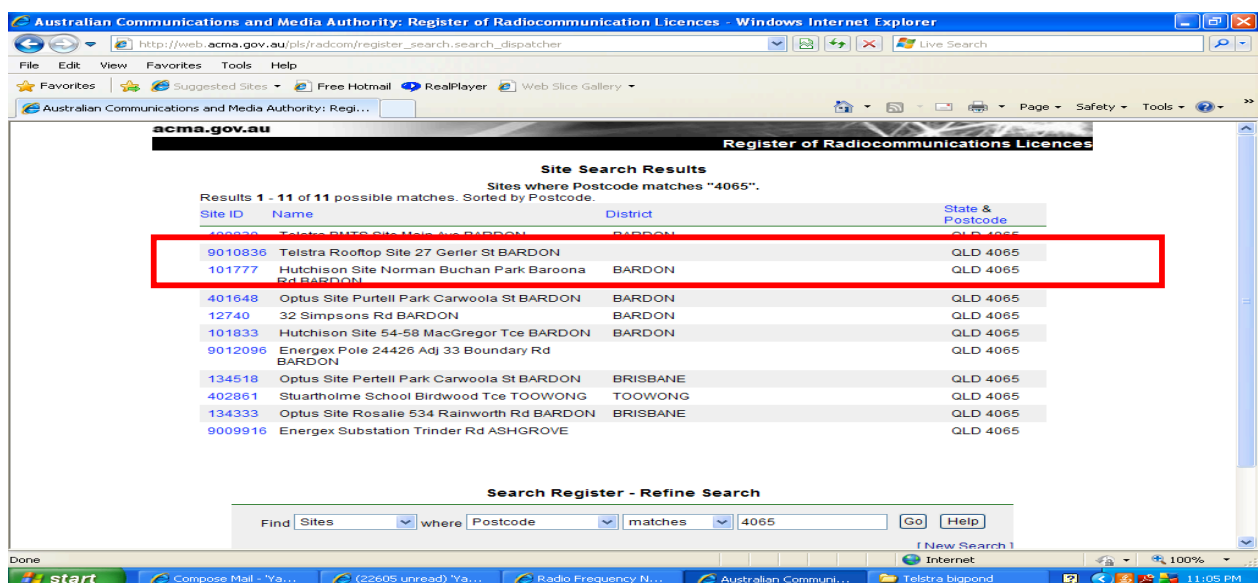
05 October 2010 Following the outcome of the federal election, I wrote to Ms Richardson requesting that she reconsider her decision, and investigate my formal complaint.

13 October 2010 Ms Richardson acknowledged my letter and advised she would respond in the near future.

25 October 2010 the ACMA wrote to me advising that my complaint would be recorded on the ACMA's annual statistics, as a complaint against the ACIF code, and that Telstra had advised the ACMA of its intention to terminate the 27 Gerler street proposal, confirming its intention not to investigate my complaint. There was no

05 November 2010 the 27 Gerler street "proposed base station" is no longer identified on the RFNSA web site as a proposed Telstra facility,

09 November 2010 27 Gerler street is still identified on the ACMA's web site in the register of radiocommunications licences. This is causing some angst to the residents of 27 Gerler Street, and the neighbours who will be affected by this proposed base station



3. ACMA Failure to investigate Newspaper Article 12/02/10 fully

My concerns are as follows:

1. The ACMA did not act with impartially, in a disagreement between Telstra and the Bardon community around the proposed siting of a mobile phone base station. By seeking input from Telstra only before publishing its letter³ the ACMA appear to have formed conclusions based on incomplete information.
2. The ACMA failed to contact the independent report's authors (EMC Services) for comment prior to drafting its letter to Telstra's Mike Woods.
3. The ACMA's failure to completely investigate issues contained in a Brisbane City Council EMR report, or seek feedback from the community before publishing their conclusions,
4. The ACMA failed to mention the primary allegation in the Courier Mail's article, that predicted EMR levels at the school would be 60 times greater than present,
5. The ACMA did not explain why there were significant variances between the measurements of existing EMR taken by Telstra's consultant, and Brisbane City Council's independent consultant.
6. The ACMA failed to address secondary issues from the EMC report, that the maximum EMR predicted from the 27 Gerler Street base station would make it one of the most powerful base stations in Australia,
7. The ACMA failed to investigate the fact that the predicted EMR in EMC's report was significantly greater than previously reported to the community, or published on the RFNSA web site.
8. The ACMA enabled Telstra to use its letter³ to suggest the ACMA had found in favour of Telstra with respect to the proposed Gerler street base station, and the differences between Radhaz and EMC's reports.

Background

Brisbane City Council commissioned *EMC Services (December 2009)* to undertake an independent report into the predicted EMR at and around Rainworth State School. This report was commissioned in response to community concerns of the independence of the Telstra commissioned report by *Radhaz (October 2009)*

Brisbane's Courier Mail newspaper reported on 10 February 2010 that if the base station went ahead the EMR levels at the school would be at least 60 times higher than current levels

On 16 February 2010 the ACMA sought Telstra's views on the predicted EMR levels from 27 Gerler Street (**attachment A**).

On 04 March the ACMA wrote³ to Telstra, concluding that the proposed base station was in compliance with the ACMA mandated EME health exposure limits.

At no point did the ACMA's **Mr Hartwig** seek input from the community or the reports authors (EMC services) on this issue, nor did his letter address the primary allegation in the Courier Mail's article, that the EMR levels at the school would be at least 60 times higher than current levels.

The ACMA's letter was subsequently provided by Telstra to myself, in a manner that suggested the ACMA had investigated the differences between the RadHaz and EMC reports, and found in favour of Telstra

³ ACMA letter reference ACMA2009/2559, dated 04 March 2010 From Mr **Geoff Hartwig** to Telstra's Mr Mike Wood

The following differences between the 2 reports remain outstanding. The ACMA's letter did not address the following community concerns

1. EMC and Radhaz reports estimated the maximum predicted EMR at several points around the proposed base station at 27 Gerler street. Only 1 of the locations where measurements were taken was the same in both reports, that is the playground equipment at the school. EMC reported the background EMR at the play equipment was 60 times greater than the current levels estimated by Radhaz⁴
2. Once the base station at 27 Gerler street was constructed to it's interim configuration, EMC predicted the maximum EMR (at 25 Gerler street) would be 29%⁵ of the ARPANSA limit (**130 μ W/cm²**), making it the most powerful base station in Bardon or surrounding suburbs, This fact was not disputed by the ACMA, nor was it addressed in the ACMA's letter to Mike Wood. However this was of grave community concern, especially since health effects have been reported (Kundi and Hutter⁶) as low as **5-10 μ W/cm²**, and an increasing number of countries (including 9/27 EU countries, China, Russia and others) are setting precautionary levels around **10 μ W/cm²**.
3. Once the base station at 27 Gerler street was constructed to it's ultimate configuration, the predicted EMR at 25 Gerler street would be 44% of the ARPANSA limit. (**198 μ W/cm²**). This fact was not contested by the ACMA, nor was it addressed in the ACMA's letter to Mike Wood either. Again significantly higher than the precautionary levels set, or being trialed by an increasing number of countries.
4. At 29% (**130 μ W/cm²**) and 44% (**198 μ W/cm²**) of the Australian safety standard, the proposed facility at 27 Gerler street was significantly higher than any previously published estimated EMR levels at the site, higher than any facility in Bardon or surrounding suburbs
5. With health effects reported at **5-10 μ W/cm²**, can the ACMA guarantee the safety of residents or workmen at 25 Gerler Street, possibly working in an EMR environment of up to **130 μ W/cm²**.

Incidentally, it appears that the unit of measurement chosen by Radhaz (W/m²) appears to have been chosen to provide the illusion that the EMR is negligible, a bit like measuring the width of a finger in kilometres, whilst factually correct, it is not a useful unit of measurement to the layman, and implies the EMR is barely measurable .

⁴ Radhaz report #40708 October 2009 page 12; table 4 records existing power density of 0.0001558 W/m² EMC report #91208 December 2009 page 6 table 1 records the existing power density of 0.01 W/m²; 0.01/0.0001558 = 64.8 times greater

⁵ EMC report No 91208 dated 22 December 2009

⁶ Source Kundi, M and Hutter, H. Mobile phone base stations – Effects on wellbeing and health. *Pathophysiology* 2009; 16:

4. Removal of Property information from EMR Reports

My concerns is as follows:

1. By removing house numbers from EMR reports published on RFNSA web site it is not possible for affected community members to identify the effect of EMR from a mobile phone base station on their property

Background

I have been advised that the ACMA have instructed Teleco's to remove house numbers on EMR reports, making it impossible to identify specific properties. .and the effect of EMR on their property.

The following screen shots are from EMR reports published on the RFNSA web site for 27 Gerler street on 07/08/09 and 24/09/09

<p><i>attach. to letter 07.09.09</i></p> <p>Appendix A</p> <p>Table of Other Areas of Interest</p> <table border="1"> <thead> <tr> <th>Additional Locations</th> <th>Height / Scan relative to location ground level</th> <th>Maximum Cumulative EME Level All Carriers at this site (% of ARPANSA exposure limits²) Public exposure limit = 100%</th> </tr> </thead> <tbody> <tr> <td>Residential - 25 Gerler St</td> <td>0m to 10m</td> <td>9.14%</td> </tr> <tr> <td>Residential - 33 Gerler St</td> <td>0m to 7m</td> <td>2.014%</td> </tr> <tr> <td>Residential - 32-34 Gerler St</td> <td>0m to 4m</td> <td>2.33%</td> </tr> <tr> <td>Residential - 28-30 Hebe St</td> <td>0m to 7m</td> <td>0.22%</td> </tr> <tr> <td>Residential - 45 Hebe St</td> <td>0m to 7m</td> <td>0.041%</td> </tr> </tbody> </table> <p>Table: Estimation for the maximum EME levels at selected areas of interest over a height range relative to the specific ground level at the area of interest. This table includes any existing and proposed radio systems.</p>	Additional Locations	Height / Scan relative to location ground level	Maximum Cumulative EME Level All Carriers at this site (% of ARPANSA exposure limits ²) Public exposure limit = 100%	Residential - 25 Gerler St	0m to 10m	9.14%	Residential - 33 Gerler St	0m to 7m	2.014%	Residential - 32-34 Gerler St	0m to 4m	2.33%	Residential - 28-30 Hebe St	0m to 7m	0.22%	Residential - 45 Hebe St	0m to 7m	0.041%	<p><i>Extract from EMR report for proposed base station at 27 Gerler Street dated</i></p> <p>07 August 2009</p> <p><i>able to identify locations in "Other areas of interest"</i></p>			
Additional Locations	Height / Scan relative to location ground level	Maximum Cumulative EME Level All Carriers at this site (% of ARPANSA exposure limits ²) Public exposure limit = 100%																				
Residential - 25 Gerler St	0m to 10m	9.14%																				
Residential - 33 Gerler St	0m to 7m	2.014%																				
Residential - 32-34 Gerler St	0m to 4m	2.33%																				
Residential - 28-30 Hebe St	0m to 7m	0.22%																				
Residential - 45 Hebe St	0m to 7m	0.041%																				
<p>Appendix A</p> <p>Table of Other Areas of Interest</p> <table border="1"> <thead> <tr> <th>Additional Locations</th> <th>Height / Scan relative to location ground level</th> <th>Maximum Cumulative EME Level All Carriers at this site (% of ARPANSA exposure limits²) Public exposure limit = 100%</th> </tr> </thead> <tbody> <tr> <td>Residential - Gerler St</td> <td>0m to 10m</td> <td>3.76%</td> </tr> <tr> <td>Residential - Gerler St</td> <td>0m to 7m</td> <td>0.86%</td> </tr> <tr> <td>Residential - Gerler St</td> <td>0m to 4m</td> <td>2.26%</td> </tr> <tr> <td>Residential - Hebe St</td> <td>0m to 7m</td> <td>0.098%</td> </tr> <tr> <td>Residential - Hebe St</td> <td>0m to 7m</td> <td>0.019%</td> </tr> <tr> <td>School - Rainworth Primary</td> <td>0m to 7m</td> <td>0.22%</td> </tr> </tbody> </table> <p>Table: Estimation for the maximum EME levels at selected areas of interest over a height range relative to the specific ground level at the area of interest. This table includes any existing and proposed radio systems.</p>	Additional Locations	Height / Scan relative to location ground level	Maximum Cumulative EME Level All Carriers at this site (% of ARPANSA exposure limits ²) Public exposure limit = 100%	Residential - Gerler St	0m to 10m	3.76%	Residential - Gerler St	0m to 7m	0.86%	Residential - Gerler St	0m to 4m	2.26%	Residential - Hebe St	0m to 7m	0.098%	Residential - Hebe St	0m to 7m	0.019%	School - Rainworth Primary	0m to 7m	0.22%	<p><i>Extract from EMR report for proposed base station at 27 Gerler Street dated</i></p> <p>24 September 2009</p> <p><i>Not able to identify locations in "Other areas of interest"</i></p>
Additional Locations	Height / Scan relative to location ground level	Maximum Cumulative EME Level All Carriers at this site (% of ARPANSA exposure limits ²) Public exposure limit = 100%																				
Residential - Gerler St	0m to 10m	3.76%																				
Residential - Gerler St	0m to 7m	0.86%																				
Residential - Gerler St	0m to 4m	2.26%																				
Residential - Hebe St	0m to 7m	0.098%																				
Residential - Hebe St	0m to 7m	0.019%																				
School - Rainworth Primary	0m to 7m	0.22%																				