

# PROBLEMS WITH NIER

MEASUREMENT LIMITATIONS

FCC INTERPRETATIONS

# Port of Seattle Crane Induced RF From Nearby MW Station



# Make Up of IEEE Committee

– Research (University 37, Nonprofit 8, Military 15 & Government Research 30)	90
– Industry	12
– Industry Consulting	4
– Government	5
– General Public	14
– TOTAL	125

# IEEE Standards

- Based on 321 Research Papers
- Two Tier Standard
  - Controlled Environment (Occupational)
  - Uncontrolled Environment (Public)
- Specific Absorption Rate (SAR) where “potentially-deleterious health effects occur”

# IEEE Standards

- SAR for standard is 4 W/kg
- Maximum Permissible Exposure (MPE)
  - 1/10 of SAR for Occupational
  - 1/50 of SAR for Public
- No verified reports of injury to humans or adverse effects on the health of humans who have been exposed to electromagnetic fields within the limits

# Lifespan and Cancer in Laboratory Mammals Exposed to Radiofrequency Radiation

Joe A. Elder, Ph.D.

Motorola Florida Research Laboratories

Plantation, FL 33322

In conclusion, the weight-of-evidence in RF studies describing lifespan data and cancer in the same animal populations shows that RF radiation does not adversely affect lifespan or cancer incidence at whole-body SARs  $\leq 1.5$  W/kg and brain SARs  $\leq 2.3$  W/kg.

# IEEE Occupational Standards

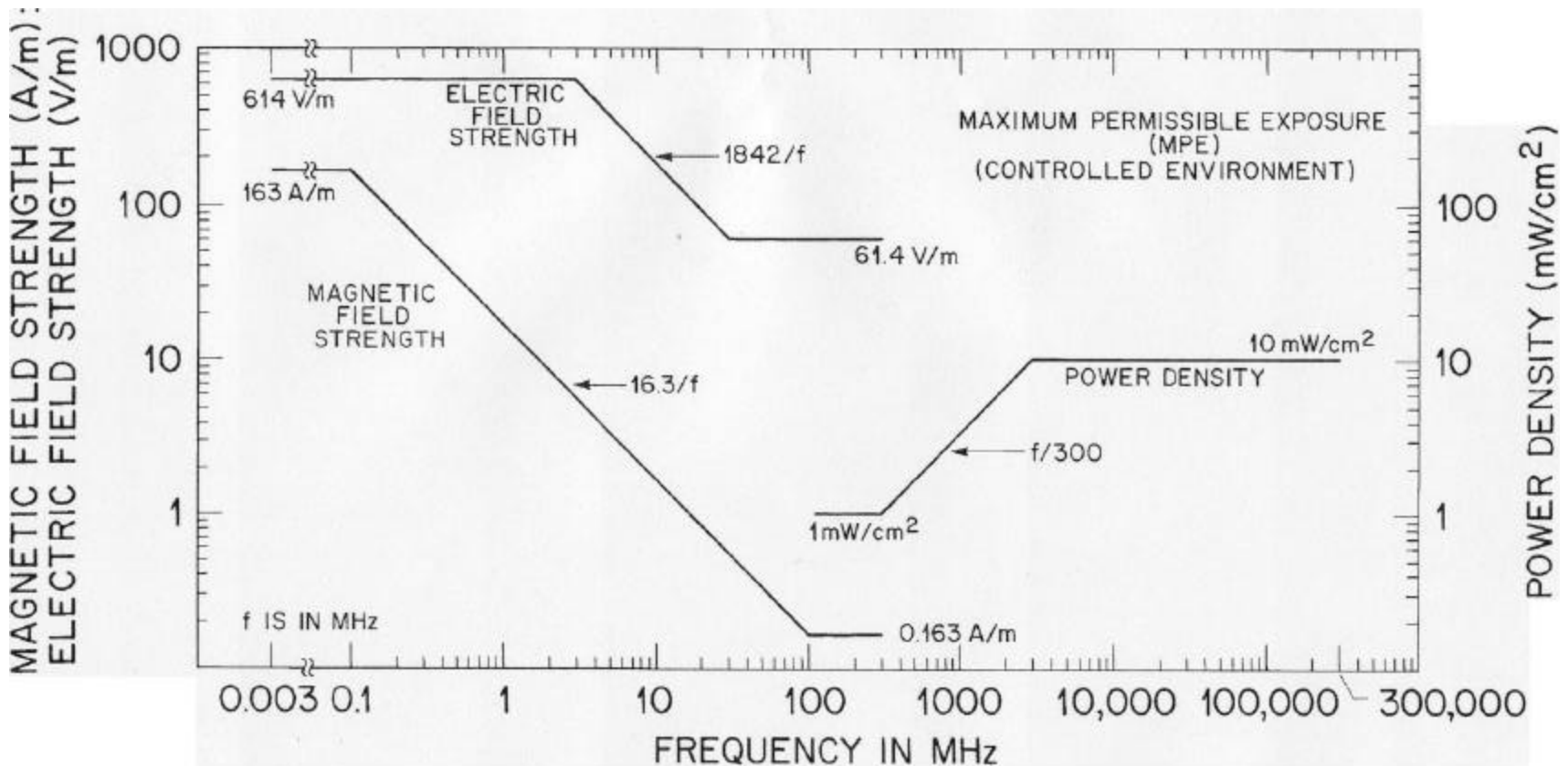


Figure E.2—Graphic representation of maximum permissible exposure in terms of fields and power density for a controlled environment

# IEEE Public Standards

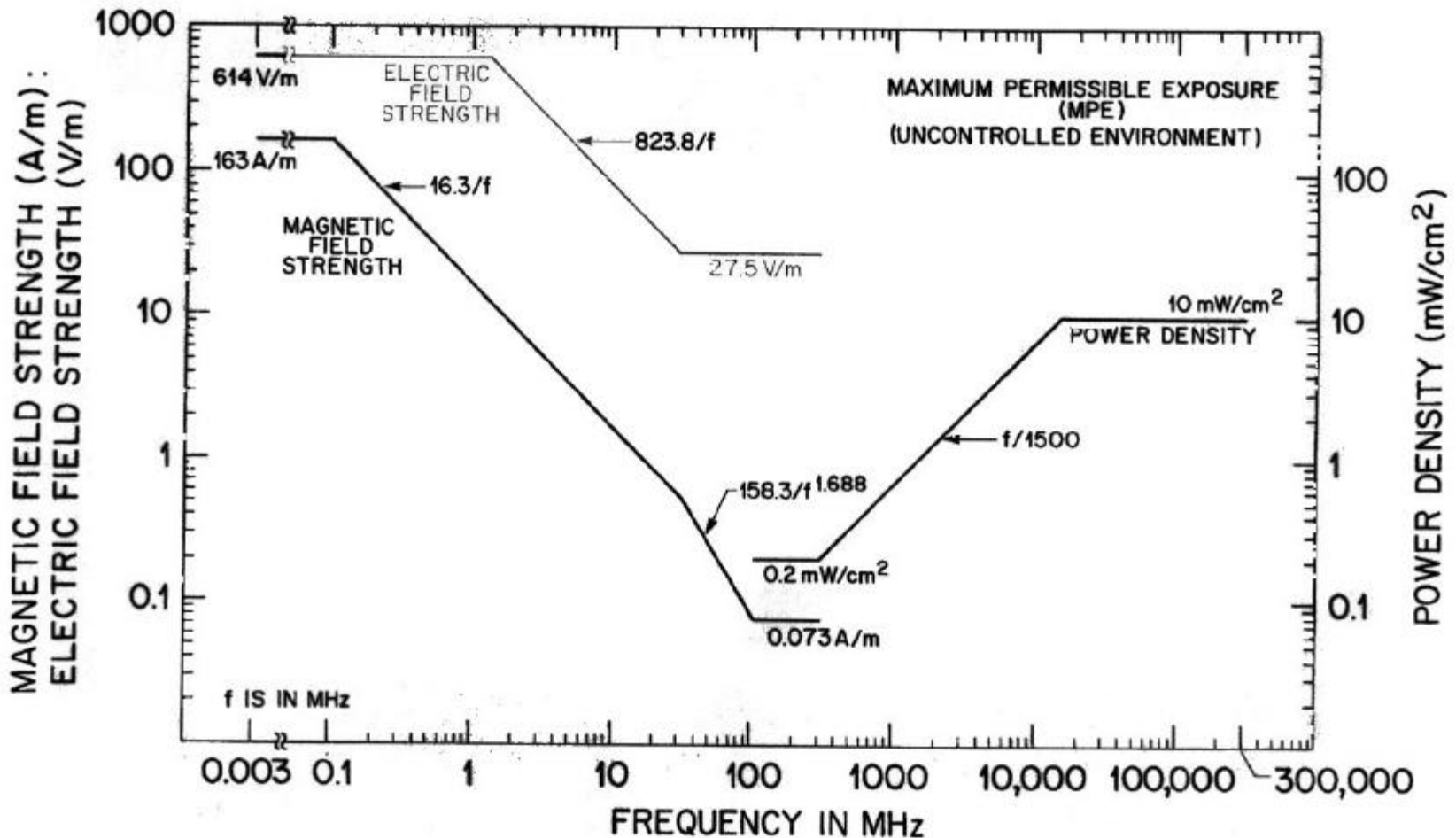


Figure E.4—Graphic representation of maximum permissible exposure in terms of fields and power density for an uncontrolled environment



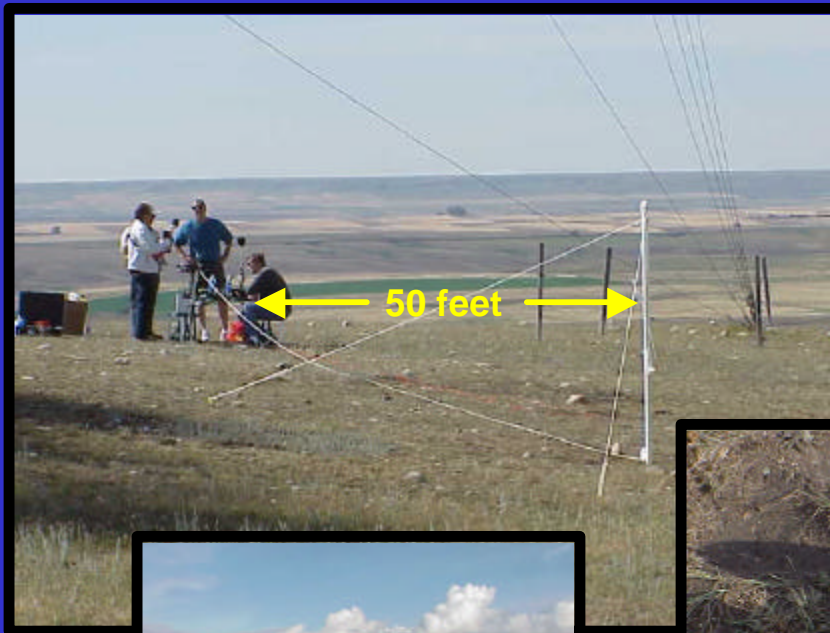
# Comparison of Occupational Standards

Frequency	IEEE	ICNIRP
300 kHz	614 V/m – 54.3A/m	610 V/m – 5.33 A/m
1 MHz	614 V/m – 16.3 A/m	610 V/m – 1.60 A/m
3 MHz	614 V/m – 5.43 A/m	203 V/m – 0.53 A/m
10 MHz	184 V/m – 1.63 A/m	61 V/m – 0.16 A/m
30 MHz	61.4 V/m – 0.54 A/m	61 V/m – 0.16 A/m

# Comparison of Public Standards

Frequency	IEEE	ICNIRP
300 kHz	614 V/m – 54.3A/m	87.0 V/m – 2.43 A/m
1 MHz	614 V/m – 16.3 A/m	87.0 V/m – 0.73 A/m
3 MHz	274 V/m – 5.43 A/m	50.2 V/m – 0.24 A/m
10 MHz	82.4 V/m – 1.63 A/m	27.5 V/m – .073 A/m
30 MHz	27.5 V/m – 0.54 A/m	28.0 V/m – .073 A/m

# The Test Site – Shelby, Montana



**Richard Tell Associates, Inc.**  
**Las Vegas, NV**

**Hatfield & Dawson, LLC**  
**Seattle, WA**

# Factors Affecting RF Measurement Accuracy and Meaning

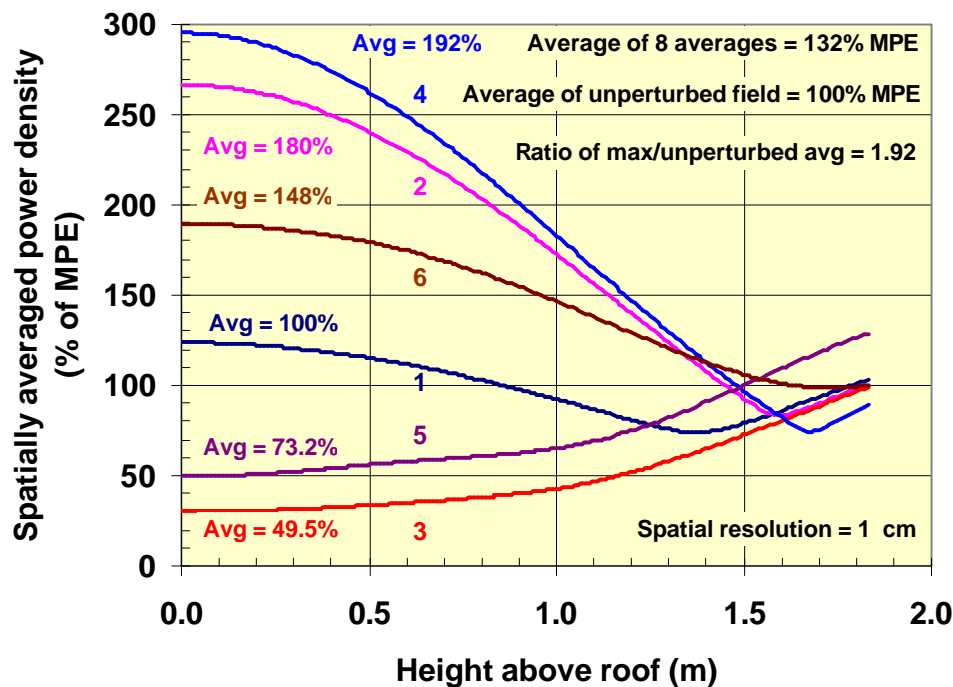
- Probe calibration accuracy
- Probe frequency response
- Multiplicity of fields (rms response)
- Polarization of fields
- Spatial distribution of fields
- Interference with field to be measured by observer (field perturbation)

# Studying the Effect of Field Perturbation on Measured RF Fields

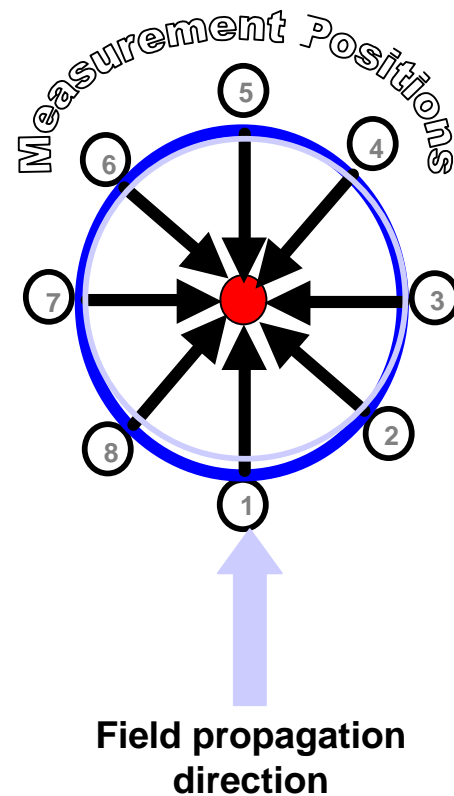
- Establish a “pure” test environment
- Determine the “unperturbed” field
- Measure influence of field perturbation caused by observer

# A Theoretical Assessment of Operator Interaction with Fields

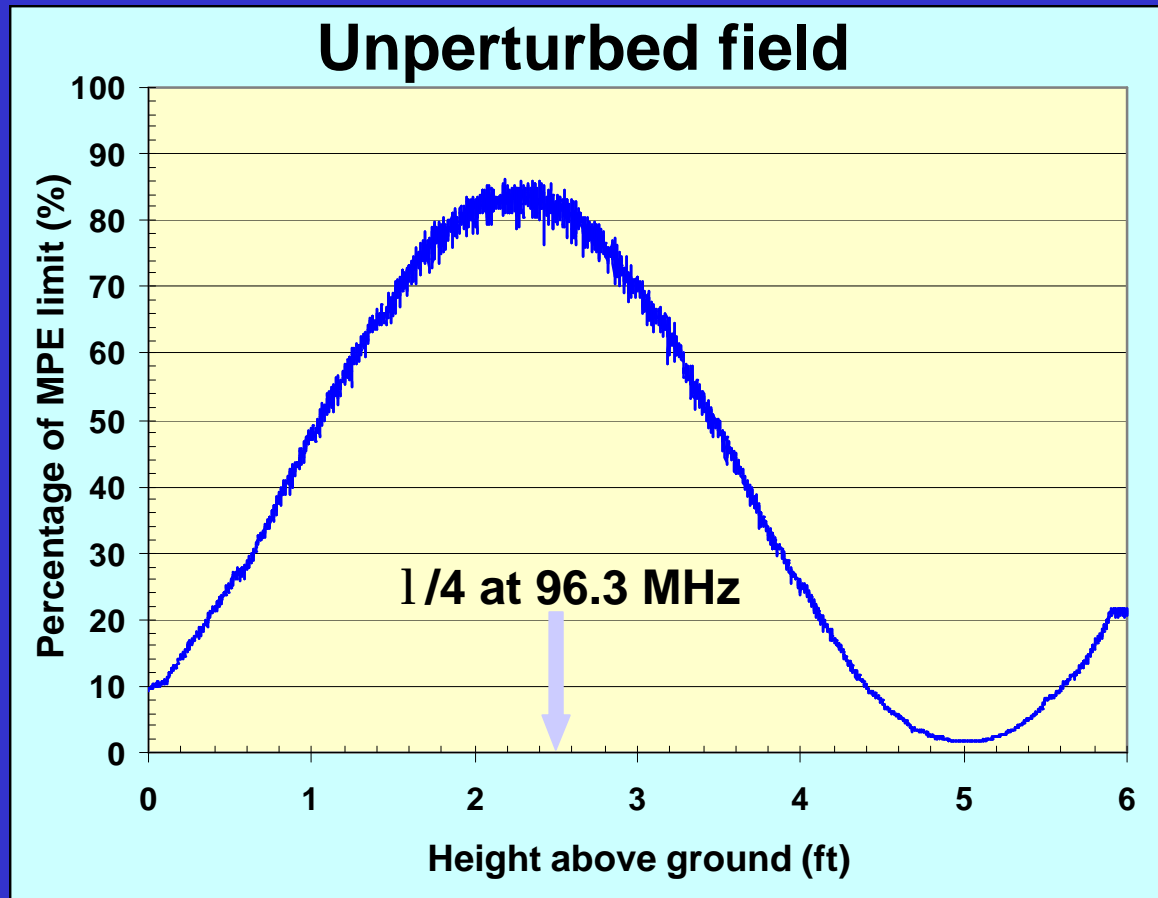
**Spatially Averaged Power Density Along Vertical 1.8 m Line with Effects of 20 cm Radius Reflecting Cylinder at 1 Meter in Different Orientations**



- 1 No reflect
- 2 Behind
- 3 Front
- 4 Right rear
- 5 Right front
- 6 Side



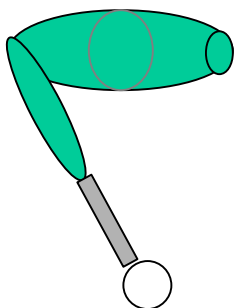
# Typical Spatial Variation of Power Density at 30 Feet from KZIN Tower, Shelby, Montana



**Richard Tell Associates, Inc.**  
Las Vegas, NV

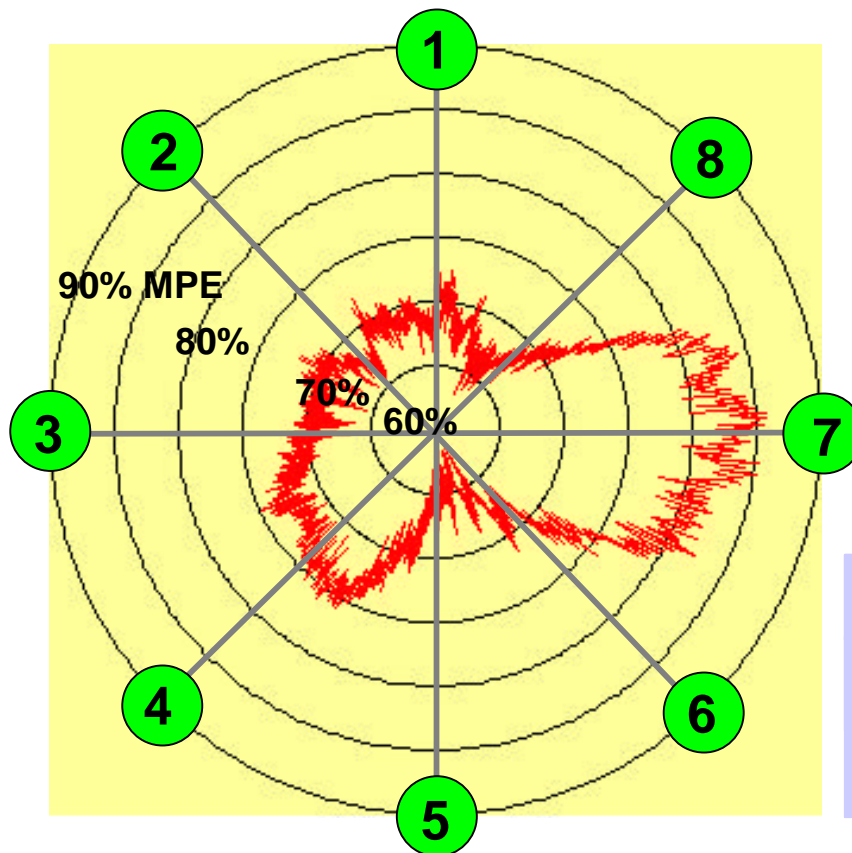
**Hatfield & Dawson, LLC**  
Seattle, WA

# Polar Plot of Field Perturbation Caused by Observer



Technician faces  
measurement  
point from all  
directions.

KZIN FM 96.3  
MHz Shelby, MT  
8-1-2001

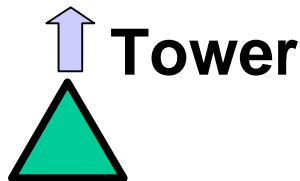


Plotted for height  
of maximum  
unperturbed field  
of 86.5% MPE.

$S_{\max} = 85.8\%$  MPE

$S_{\min} = 61.7\%$  MPE

$S_{\text{avg}} = 71.2\%$  MPE

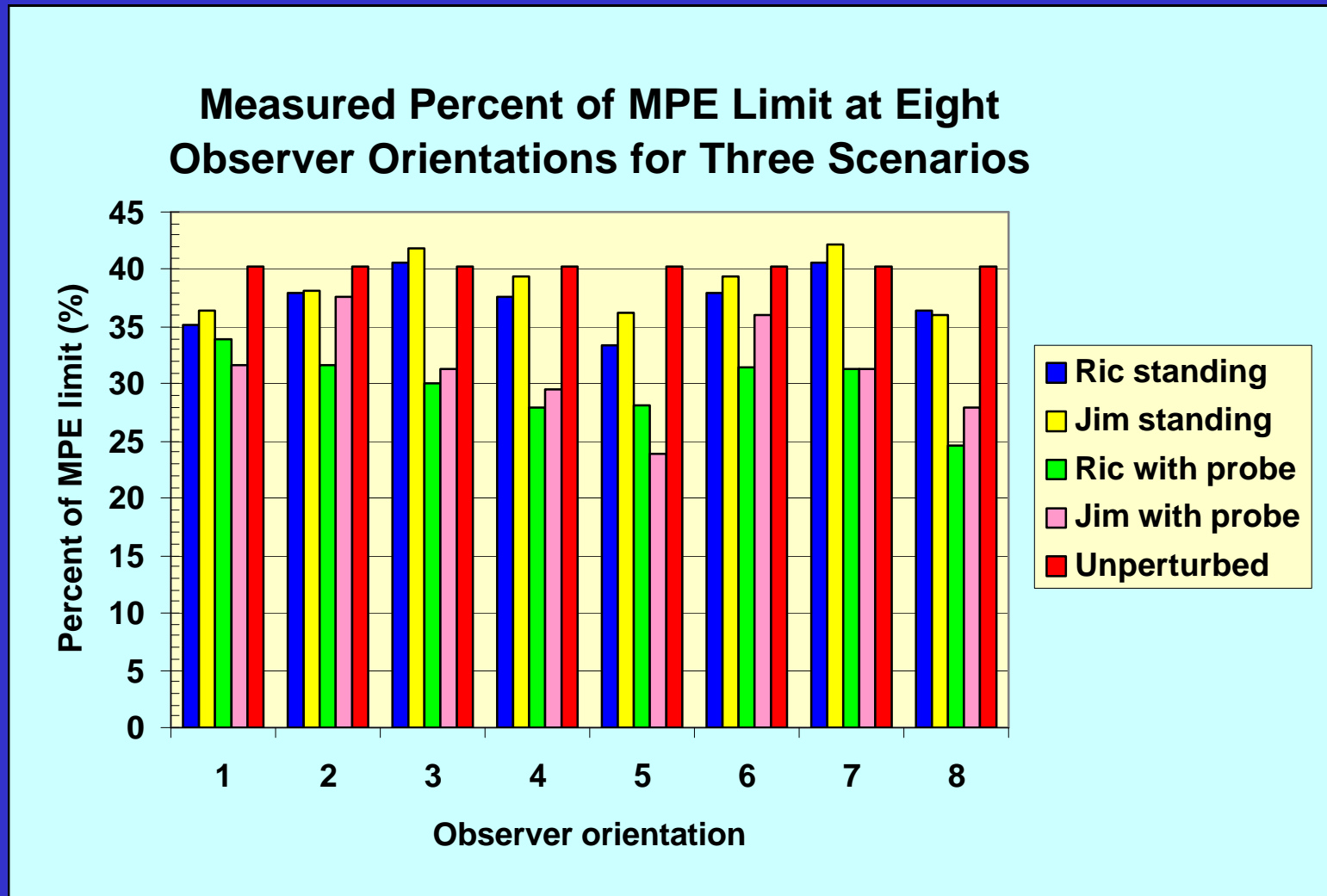


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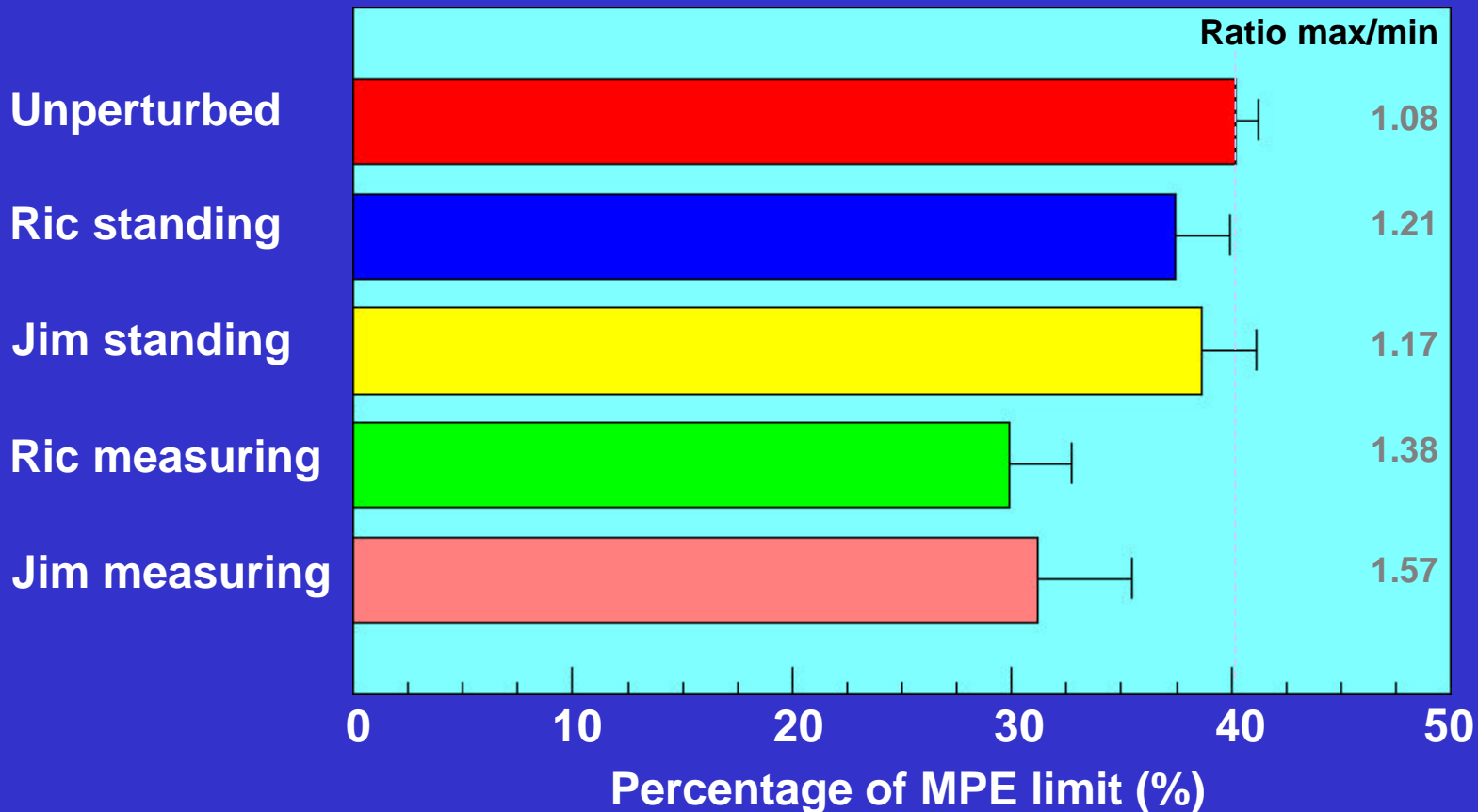


# Preliminary Spatial Average Measurement Results

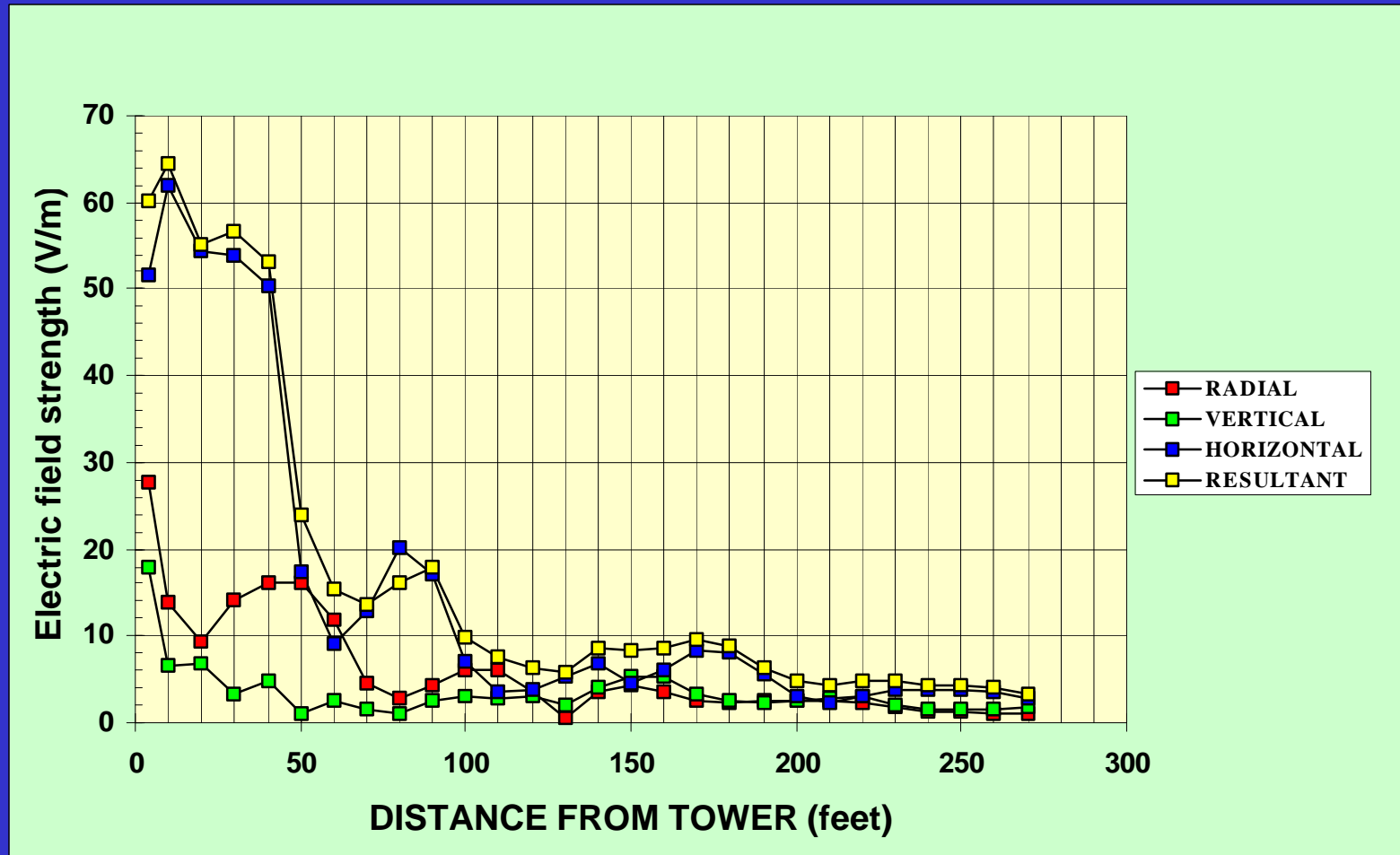


# Overall Average of Spatial Average Measurements

Based on 8 spatial averages for each scenario

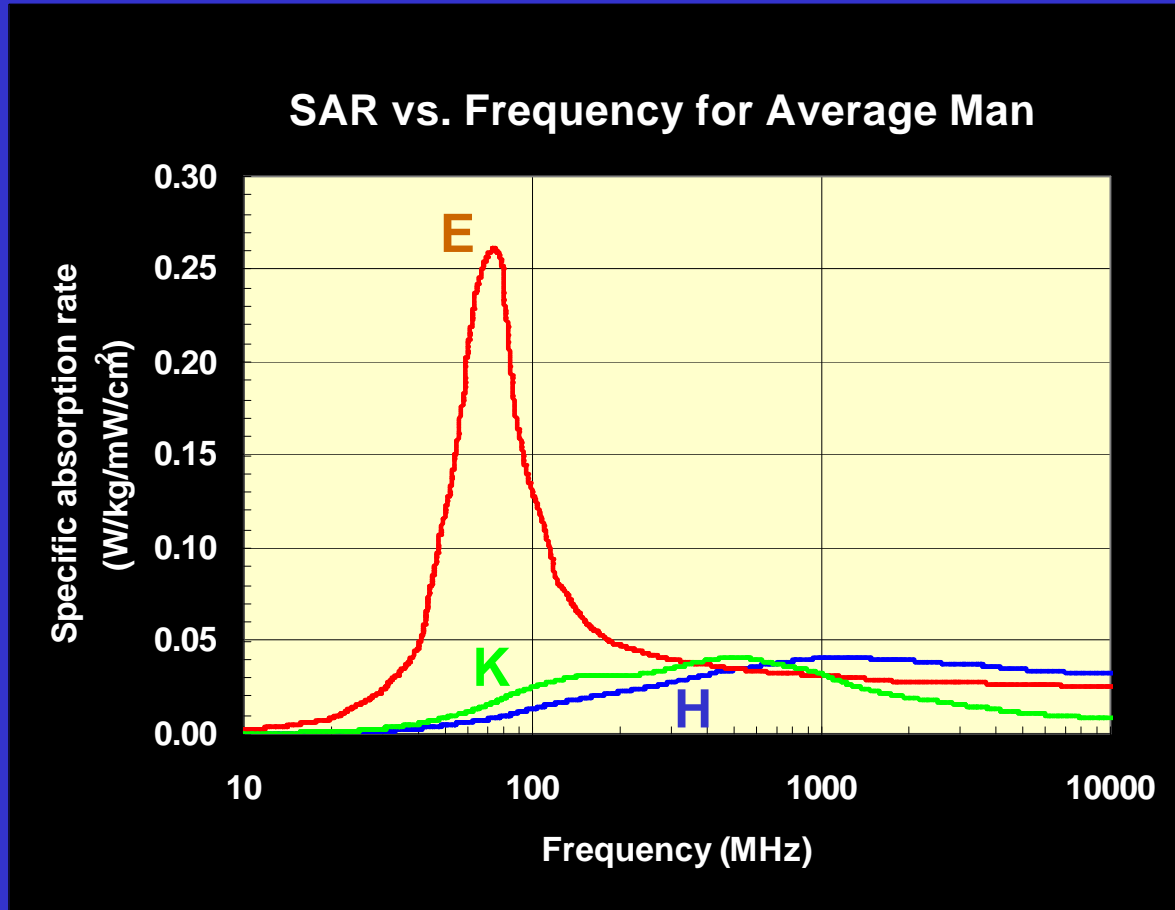


# Electric Field Strength Polarization Components vs. Distance from KZIN Tower



# Polarization and SAR

Isotropic field probes will generally overestimate  
resulting SAR



Relative SAR Contribution

F = 96.3 MHz

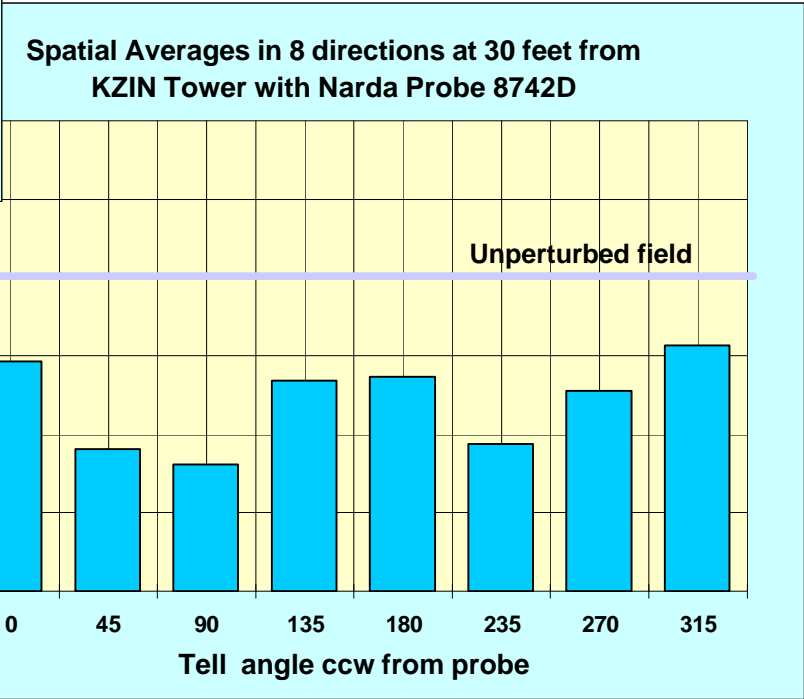
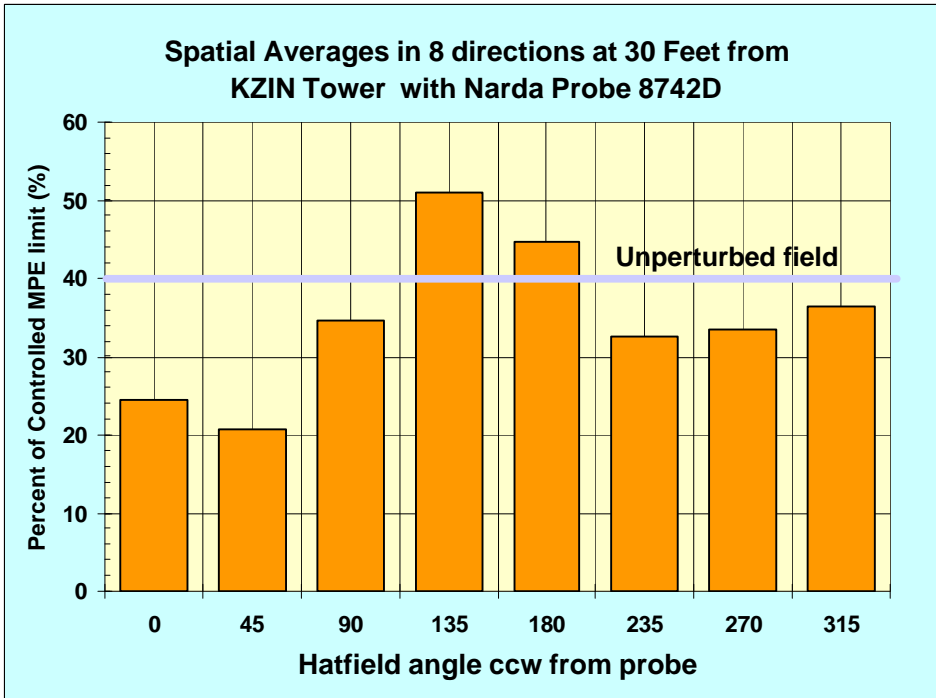
E: 100%

H: 9.3%

K: 17.6%

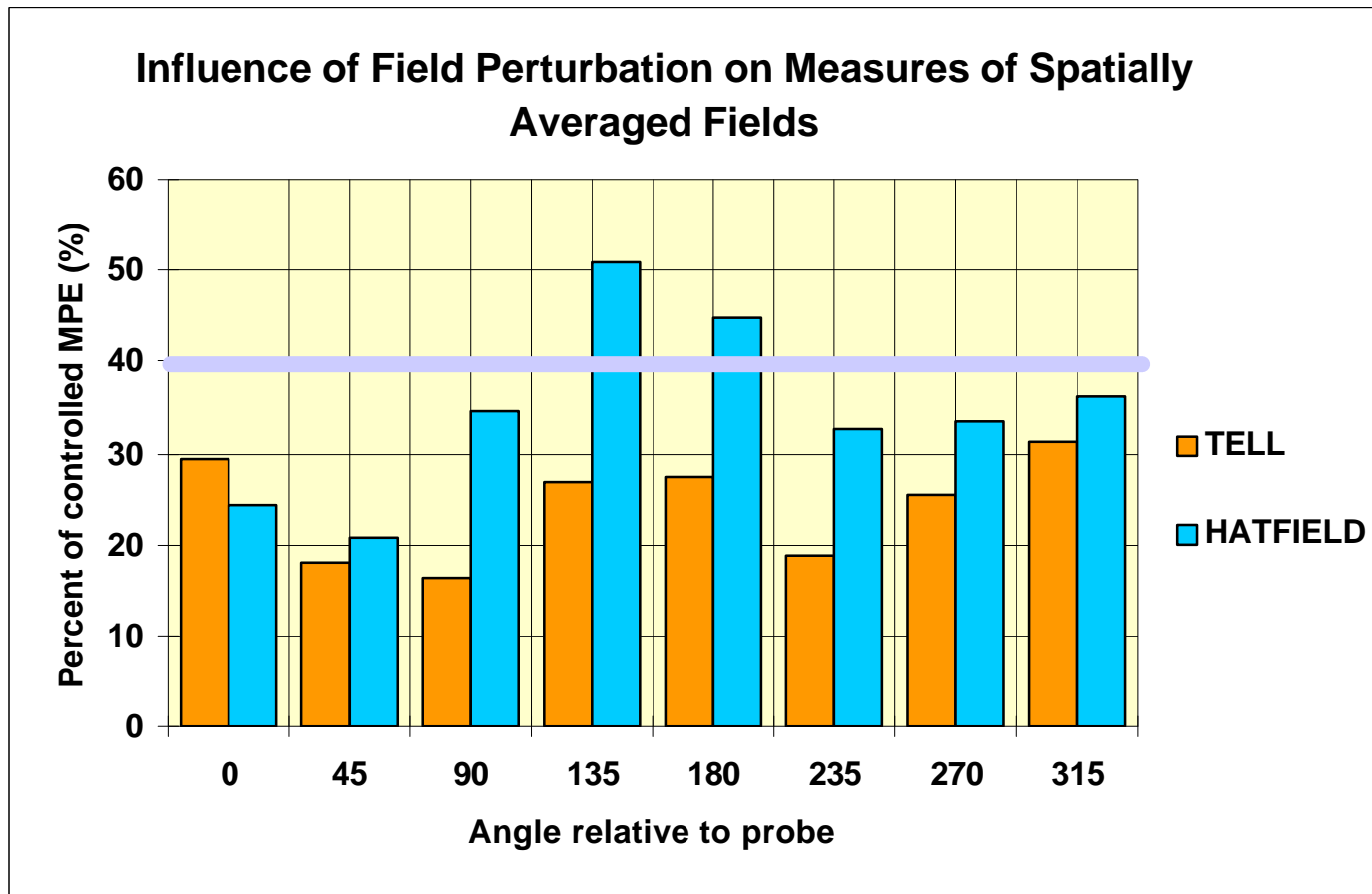
Total SAR from all  
field components at  
test point = 10% of  
the SAR that would  
be implied from a  
measurement of the  
resultant field.

# Comparison of measurements of spatially averaged RF fields



Assessing compliance with exposure limits can be difficult.

# Comparison of Two Persons Using the Same Probe at Same Point



**Richard Tell Associates, Inc.**  
Las Vegas, NV

**Hatfield & Dawson, LLC**  
Seattle, WA

# How Strong is that Field?

- The FCC maximum permissible exposure (MPE) limits are in terms of spatially averaged values of plane wave equivalent power density over the body.
- The limits are derived from the presumption of uniform exposure to a field having the specified MPE limit.
- The most accurate assessment of exposure, relative to determining compliance with the FCC limits, is in the absence of any field perturbing effects introduced by either the person being exposed or the person attempting to measure the exposure.

# Tentative Conclusions

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- Measures of spatially averaged RF fields are inherently fraught with uncertainty caused by field perturbations.
- Operator interaction with the field can lead to significant differences in compliance measurements at antenna sites.