



# International Amateur Radio Union Region 1

Europe, Middle East, Africa and Northern Asia      Founded 1950

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To: Minister for Digital Policy and Information [sec@mindigital.gr](mailto:sec@mindigital.gr)

General Secretariat of Telecommunications and Posts [gge@yme.gov.gr](mailto:gge@yme.gov.gr); [gge@mindigital.gr](mailto:gge@mindigital.gr)

cc: Radio Amateur Association of Greece [raag-hq@raag.org](mailto:raag-hq@raag.org)

Date: November 5<sup>th</sup> 2018

## Re: Licensing and construction Inspection of Land based Antennas

Dear Sirs,

The International Amateur Radio Union (IARU) represents the interest of radio amateurs around the world to Regional Telecommunications Organisations like CEPT (with whom we have an LoU), Standards Development Organisations and the ITU itself, of which IARU is a Sector member. IARU is the global federation of national associations of licensed radio amateurs.

Amateur radio is an activity defined in the ITU radio regulations as:

*a radiocommunication service for the purpose of self-training, intercommunication and technical investigations carried out by amateurs, that is, by duly authorized persons interested in radio technique solely with a personal aim and without pecuniary interest.<sup>1</sup>*

It is an activity followed by some 3.5 million people around the world. Not only is it a valuable means of self-training in electronics, computing and radio communication (with a consequent positive impact on the hi-tech skill base of each nation) but radio amateurs play an important part in providing emergency communications at a time of natural or man-made disasters. Provisions of the ITU Tampere<sup>2</sup> Convention include specific reference to the amateur radio service at times of emergency.

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<sup>1</sup> ITU Radio Regulations §1.56

<sup>2</sup> <https://www.itu.int/en/ITU-D/Emergency-Telecommunications/Pages/TampereConvention.aspx>

Our attention has been drawn to the current consultation being undertaken by the Ministry of Digital Policy and Information of the Greek Government regarding the installation of land-based antennas. We are deeply concerned that some of the proposed restrictions on the installation of antennas for use by radio amateurs are deeply punitive and will cause significant hardship to those who seek to follow an interest in amateur radio.

Our concerns are as follows:

a) We understand that for the installation of a radio amateur antenna on a terraced apartment building, the written consent of all owners is proposed to be required. If this measure were to be implemented, it would be the most draconian that we are aware of anywhere in the world, in respect of consent for a radio antenna for use by a radio amateur. Normal practice elsewhere would be for the consent of the majority of building owners or in the case of leased accommodation the consent of the landlord. To require 100% agreement of all residents seems quite simply a means to ensure that the antenna will not be erected.

b) EMF fields from amateur antennas are generally well away from human contact and simple tools exist to ensure that field strength exposure at publicly accessible distances can be verified as being well within ICNIRP limits<sup>3</sup>. In a few countries today, a study is required by the radio amateur using a simple computer-based tool to self-certify that the antenna will not create a field which approaches the ICNIRP reference limits at any point where members of the public might access.

The IARU position is that the likelihood of any excessive field from a radio amateur antenna is extremely low, and can be simply checked by the radio amateurs themselves. The level risk from HF antennas, for example, is at least an order of magnitude (10x) *lower* than from, eg, a mobile cellphone base station mast, even before allowing for the much lower duty cycle of the amateur emissions.

c) We note also that there are no similar installation restrictions being considered for radio, television, mobile telecommunications and other commercial use. We are therefore concerned that the measure is unreasonably discriminatory against those who follow an interest in amateur radio and in many instances use antennas similar to those used in television reception.

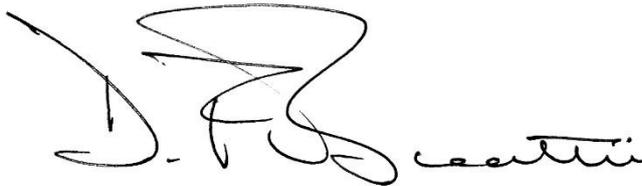
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<sup>3</sup> International Commission on Non-Ionizing Radiation Protection

IARU fully understands and accepts that the decision on this matter is for the Greek government alone. Nonetheless, we invite the Ministry and the Government to consider the nature of amateur radio, its contribution to society and its non-commercial nature, and to exempt amateur radio antennas from these restrictions by taking a self-certification route to issues of EMF field and a balanced approach to installation consent.

I am happy to provide more commentary if it would be helpful.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. F. Beattie', with a stylized flourish at the end.

**Donald F Beattie**



**Donald F Beattie B.Sc(Eng), ACGI, FIoD, FRSA, Chartered CCIPD  
President, IARU Region 1**

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