

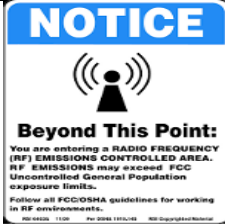



SUMMARY REPRESENTATIONS FROM THE PUBLIC AND STAKEHOLDERS CONSULTATION PROCESS ON THE FRAMEWORK FOR ASSESSMENT OF EXPOSURE TO RF-EMF HELD BETWEEN 19TH NOVEMBER 2025 TO 13TH DECEMBER 2025





No.	Name of Stakeholder	Section of the Framework	Current Content	Proposed Content	Stakeholder Justification	Authority's position	Authority's Justification	New Content
1.	SAFARICOM PLC SAFARICOM PLC	Section 6 Paragraph 1-2	RF-EMF assessments can be done using two techniques, namely, calculation or measurement. ICT service providers will be required to assess EMF exposure levels from their ICT installations and provide three forms of assessments results. The Baseline results, which are results before installation of ICT equipment, Projected EMF results based on the proposed installations, and annual audit of the EMF exposures of at least half of their ICT installations at random sites, provided subsequent audits covers sites not audited in the immediately preceding year.	Proposed Deletion of this requirements	The reporting and audits required involve the procuring of expert services which are expensive. Requiring the same from an operator who has significant and widely distributed infrastructure in the country would negatively impact the cost of doing business and discourage further investment within the sector which does not support the transformation of the digital superhighway agenda.	Not Adopted	The Authority has adopted a declaration-based approach to regulating EMF compliance. It is the responsibility of the operator to self-assess compliance using appropriate technical standards and declare compliance with RF-EMF limits in line with international best practice as articulated in: GSMA EMF Exposure Compliance Policies for Mobile Network Sites_October_2021 In addition, the Authority has a mandate to protect members of the public from harmful radiation from telecommunications Equipment's. This can only be achieved if there is periodic measurement and self-correction	None
		Section 6 Paragraph 6	The Authority shall periodically, and in an	The Authority shall periodically, and in	We propose that compliance with the	Partly adopt the	It is not the Authority's intention to immediately take	The Authority shall periodically, and in an

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			ad hoc basis, verify the reported EMF exposure measurement from audits done by service providers. Service providers found to be having sites whose EMF exposure exceeds the set levels shall as a first measure be notified to correct the exposure levels, after which continued violations will be dealt with in line with the Kenya Information and Communications Act, 1998.	an ad hoc basis, verify the reported EMF exposure measurement from audits done by service providers. Service providers found to be having sites whose EMF exposure exceeds the set levels shall as a first measure be notified to correct the exposure levels. , after which continued violations will be dealt with in line with the Kenya Information and Communications Act, 1998.	framework be a continuous improvement process that does not occasion imposition of fines and penalties under KICA as this encourages compliance.	recommendation to Delete.. The phrase "...As a first measure..."	enforcement action and impose a financial penalty or other sanctions on a service provider user if a site on which they are present is found to be in breach of the EMF condition regardless of the circumstances. Whilst we may consider such action to be appropriate as per KICA Act, 1998, our key objective is to foster and facilitate compliance across all service providers subject to the EMF guidelines.	ad hoc basis, verify the reported EMF exposure measurement from audits done by service providers. Service providers found to be having sites whose EMF exposure exceeds the set levels shall be notified to correct the exposure levels, after which continued violations will be dealt with in line with the Kenya Information and Communications Act, 1998.
2.	ATC Kenya	Section 6 Paragraph 1-2	RF-EMF assessments can be done using two techniques, namely, calculation or measurement. ICT service providers will be required to assess EMF exposure levels from their ICT installations and provide three forms of assessment results. The Baseline results, which are results before installation of ICT	We propose that RF – EMF assessments and audits be conducted biennially, in collaboration with NEMA, when conducting statutory audits.	ICT service providers may face difficulties in allocating sufficient resources, personnel, and equipment to conduct thorough assessments and audits on a quarterly basis. We propose that the same is conducted biennially, in collaboration with NEMA, when	Not adopted	Public safety and health are paramount and cannot be compromised at the expense of the cost to be incurred by the service provider in meeting this requirement. The proposed guidelines require service providers to file EMF exposure measurements annually as stated in section 6 paragraph 9 '....and shall be filled annually by service	None

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			equipment, Projected EMF results based on the proposed installations, and annual audit of the EMF exposures of at least half of their ICT installations at random sites, provided subsequent audits covers sites not audited in the immediately preceding year.		conducting statutory audits.		providers for all new sites in the reporting financial year.'	
		Section 6 Paragraph 6	The Authority shall periodically, and in an adhoc basis, verify the reported EMF exposure measurement from audits done by service providers. The EMF Exposure Measurement Template form shall be annexed to the quarterly returns form but shall be filled annually by service providers for all new sites in the reporting financial year					
		Section 9 paragraph 1	The design of broadcast transmission sites and mobile network base station sites should prevent the public from straying into regions designed as exclusion zones.	Considering restricted zones may extend beyond the demarcated space, we propose that this requirement is amended to the extent it applies for	Most Tower Cos occupies spaces of between 10m*10m and 15m*15m for site builds, with signage currently installed at the gate.	Section 9 to be amended as.. The design of broadcast transmission sites and mobile network base	The section was meant to address physical access to regions that are deemed to be unsafe for unauthorized personnel and the need for proper signage.	The design of broadcast transmission sites and mobile network base station sites should be in a location that prevents unauthorized——public personnel from straying into accessing regions

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				<p>base station sites. Additionally, current tower utilization is based on tenant application i.e 1 tenant's restricted zone could be another tenant preferred installation height. We therefore propose that guidelines/compliance procedures should be developed for collocated/shared sites, in consultation with TowerCos and MNOs.</p>		<p>station sites should be in a location that prevents unauthorized public personnel from straying into accessing regions designed as exclusion zones.</p> <p>In addition, appropriate signage as categorized in Table 1: Recommended RF-EMF Sites Signage shall be displayed.</p> <p>For Roof Top Base stations, additional physical measures and precautions shall be put in place to meet this requirement.</p>	<p>The section has been amended to cater for rooftop base stations.</p> <p>The KICA act has provided for collocation in Section 85A</p>	<p>designed as exclusion zones.</p> <p>In addition, appropriate signage as categorized in Table 1: Recommended RF-EMF Sites Signage shall be displayed</p> <p>For Roof Top Base stations sites, additional physical measures and precautions shall be put in place to meet this requirement.</p>

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		Recommended signage shall be as detailed:		 <p>Hazard level – Notice: Used to alert people to the potential of exposures exceeding the reference levels for the public.</p>	We have further included proposals for signage as used in other Markets (US) for your consideration	Adopted with amendment of sign content.	 <p>This sign indicates that the area is safe for occupational personnel but it may exceed exposure limits for the general public.</p>	NOTICE: RF Radiation. No access to the general public.
			 <p>Hazard Level – Caution: Area of Unrestricted Occupancy, with Minor Injury Possible from Misuse - signage placement on the Fence, Gate or Rooftop access to the RF equipment typically 20 – 35 metres.</p>	 <p>Hazard Level – Caution: Used to alert persons to the possibility of exposures exceeding the reference levels for workers.</p>		adopted with ammendments	Adopted with amendments	Area of restricted Occupancy, possibility of exposures exceeding the reference levels for workers.

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			 <p>Hazard level – Warning: Area of Restricted Occupancy (Authorised Personnel Only), with Serious Injury Possible from Misuse – signage placement at the base of the tower or Roof Top mast with RF Equipment, typically 10 – 20 metres.</p>	 <p>Hazard level – Warning: Used to advise persons of potential exposures that may exceed the reference levels for workers by a factor of 10 (the safety factor in the (ICNIRP, 1998) guidelines</p>		Adopted with amendments	Adopted with amendments	Area of Restricted Occupancy potential exposures that may exceed the reference levels for workers by a factor of 10 (the safety factor in the (ICNIRP, 1998) guidelines
			 <p>Hazard Level – Danger: Area of Denied Occupancy with critical Injury Possible – signage placement at the edge of compliance zones of an RF equipment, typically 1-5 metres Transmitting equipment must be</p>	 <p>Hazard level – Danger: Only used for situations in which immediate and serious injury will occur such as in the</p>		Adopted with amendments	Adopted with amendments	Area of Denied Occupancy immediate and serious injury may occur such as in the case of RF burns and/or RF electrical shocks.

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			powered off prior to access	case of RF burns and/or RF electrical shocks.				
3.	Amazon Kuiper	General	General Document	<p>CA should adopt local and whole body exposure standards to align with ICNIRP guidelines</p>	<p>Amazon respectfully urges the CA to build upon the work of the ICNIRP and align its framework with ICNIRP findings.</p> <p>For example, the ICNIRP guidelines recognize that for relevant satellite frequency bands, threshold exposure levels for local exposure are approximately three (3) times greater than threshold exposure levels for whole-body exposure;</p>	Noted	<p>The Authority referenced the ICNIRP Framework in development of the guidelines.</p> <p>Further, the framework has distinguished whole body and localized measurements for specific absorption rates.</p>	None