



Fear, Uncertainty and Doubt: How Some Consultants Use the "FUD Factor" in RF Compliance to Separate You and Your Money



**September 1, 2000
is the FCC deadline
for demonstrating
RF compliance at all
your existing sites.**

Are you prepared?

***Will it cost you more
than necessary?***

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We all recognize that RF exposure is a complex and politically hot subject. What drives public concern is basically "fear, uncertainty and doubt". That's not all that unreasonable; the subject is complex, and it involves a potential health threat that one can't see, hear, touch, smell or taste. Thus, the public has an understandable fear of the unknown, is uncertain about the threat, and often doubts the government is appropriately protecting us all.

That same "FUD factor" is often used by consultants as a tool to jack up their fees, and illegitimately separate clients and their money. In fact, the term *FUD factor* originated in the consulting industry. The basic idea is that the consultant appears to a client to be an expert, and the client doesn't know any better. For the moment, we'll withhold our opinion on the ethical values of such consultants.

But the FUD factor has particularly been foisted on the wireless industry by RF compliance consultants and service firms — as evidenced by their marketing material and "helpful advice".

For example, one firm says "*all sites require RF measurement — software alone won't do.*" The logic here seems to be that unexpected and non-predictable "hot spots" due to metal reflections and re-radiation are controlling factors in assessing site RF compliance. The consultant's business angle, of course, is that on-site RF measurements are more expensive than software-based

analysis. But hot spots are relatively uncommon, and rarely a controlling factor in potential exposure at a site. And software-based analysis is perfectly acceptable for many if not most sites. The same consultant, by the way, sells site RF compliance software, apparently for those who don't believe his primary pitch.

Here's the line from another firm: "*Near Field Modeling?? No Way!*" The tag line on this one says "*the FCC only allows computer modeling to be used for predicting compliance in the EME far field. NOT in the near field. Only a comprehensive RF assessment with the appropriate instrumentation can work for near field measurements.*" If that's true, it seems the FCC went to a lot of unnecessary trouble publishing all the near-field mathematical models in its Office of Engineering and Technology's Bulletin 65. Indeed, the FCC has many times clearly stated that both software-based analysis and on-site measurements have their place in determining RF compliance. In fact, the FCC's near-field mathematical models are designed to conservatively over-predict potential near-field exposures, in order to assure "safe-side" estimates. Why would the FCC do all that if it discounted near-field modeling, as claimed by the consultant in question? It's just another way for a consultant to squeeze an extra few dollars out of a client with "expert misinformation".

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Pinnacle Telecom Group is not like a lot of other consulting firms — we don't "scare" money out of our clients' coffers; we are committed to offering our clients the most cost-effective RF compliance solutions, and building relationships based on quality and trust.

We offer RF site compliance services based on software-based analysis where most appropriate, and on-site measurements where necessary. We also have an economical and effective method for certifying compliance for multiple similar sites — what we call "generic analysis" — that saves our clients money.

We also offer RF safety policy development, RF safety training and, when you need it, expert testimony — all at fair prices.

In addition, if you need advice on how to satisfy your RF compliance obligations — whether for FCC site compliance or OSHA RF safety training — we can provide the most cost-effective solutions.

For information on how we can help you get the job done right and with minimal cost, contact Andrew Mermelstein by phone at 973-451-1630, ext 101, or by email at amermelstein@pinnacletelecomgroup.com.

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There's more: another "expert" consultant claims that "the FCC and many other regulatory bodies require periodic measurement to demonstrate emission and exposure compliance." We must have missed that in our own research and understanding of the requirements. While we have heard some municipalities suggest periodic measurements as a condition of wireless site construction approval, the FCC has never indicated that periodic measurements of an existing (and unmodified) facility offers any more useful information than the original analysis. If the technical parameters of a site don't change, neither does the potential exposure. In addition, in terms of the consultant's particular language references, we note that the FCC has been very careful to point out that the RF *exposure* guidelines are independent of its RF *emission* regulations, which are related to RF interference control and not RF exposure.

And then there's the OSHA requirement that people whose work bring them into frequent contact with wireless facilities receive appropriate RF safety training. Note that this requirement does not share the FCC's September 1, 2000 deadline. *It applies now.* Probably very few firms — whether wireless operators or not — have arranged for such training. At least one consultant is offering what appears to be a cost-effective training method: a CD-based software package. We don't know the cost, but it sounds like a good idea — on the surface, anyway. The problem is that OSHA has specifically stated that while computer- and video-based methods may play a role in safety training, they do not fully satisfy OSHA's vision of the trainer-trainee interaction that assures effective assimilation of the necessary information. OSHA believes *instructor-led* training is required, and it may be supplemented with other training aids —

but not supplanted by them.

Finally, someone is offering the Web domain name "rfsafety.com" for sale. No doubt at a fair price. *Sure.* Is everyone simply trying to cash in on RF compliance?

Years ago, there was an excellent book published by Harry Stein, a columnist for *Esquire* magazine, called *Ethics — and Other Liabilities*. We guess some consultants, if they read the book, missed Mr. Stein's real point: *ethics count*, even if their application negatively affects the bottom line.

The bottom line here: *Caveat emptor.* Find an RF compliance firm whose advice you can really trust — and don't simply accept the advice you get point-blank and maybe make that firm unnecessarily rich. It's your money, or if it's not yours, it's your stockholders' money — *but either way, you should treat it as if it were your own.*

Think about it: consultants are supposed to provide you advice on how best to run your business — *but when have you met an RF compliance consultant who focused on actually saving you money?* The fact is that the costs of RF compliance are not an investment that has a positive effect on your bottom line. It's a "regulatory burden" and an expense, pure and simple. It's also your way of "taking care of the humans". But you can minimize the costs while still getting the job done.

One final word: there's more than one consultant out there who pushes compliance services with something along the lines of "RF exposure can kill you." The odds of that are slim, but the odds that the expenses of RF compliance with some consultants *will kill you* is another story.

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AFTER "ZERO TOLERANCE" ON FCC TOWER REGISTRATIONS, WILL THE NEXT TARGET BE RF COMPLIANCE?

We're not into fear-mongering, but when the FCC soon completes its "no excuses" auditing program on antenna structure registration, is it reasonable to assume the next target will be RF compliance, given the associated September 1st deadline?