

From: Marc Arazi [marc@arazi.fr]  
Date: Monday 12 June 2017 09.25  
To: [gilles.bregant@anfr.fr](mailto:gilles.bregant@anfr.fr)  
Cc: AGNANI Jean-Benoit; Marc Arazi  
Subject : Re : TR: Request for 2015 ANFR study on SAR values for mobile phones  
Importance: High

Dear Sir:

On 1 June 2017, you chose to make public the SAR head and trunk measurements carried out by ANFR between 2012 and 2016. This is a first encouraging step towards more transparency with regard to users which corresponds to the requests that I made to you during our many exchanges these last few months.

However, after a careful study of the published material, I would like to draw your attention to a number of details which, in my opinion, should have been published, but still have not been reported up until now:

- The measurements of the SAR limbs are missing. Yet the ANSES report published in July 2016 made it clear that 25% of the 95 mobile phones tested in 2015 by ANFR in contact or near contact with the skin were above the regulatory threshold of 4 W/kg.
- The measurements of the whole body SAR also do not appear in the published information.
- The complete technical report of each test measurement, an essential document, is not yet available on the DATA site.
- Some measurements in contact with the skin are not available for certain phones (for example, the Apple iPhone 7 and the Sony Xperia XA...) tested in 2016.
- The models of the manufacturers who did not declare the separation distance during the measurement protocols have not been noted whereas again in its report, ANSES recalled that 25% of them were in default.

I would therefore like to know whether you intend to make all these details available to the general public, in accordance with the response of CADA which, since 17 November 2016, recalls that these documents must be provided to all persons who have requested them. As such, I would like to remind you of my previous requests and would be grateful if you would kindly send the requested information to me as soon as possible.

Finally, I would like to let you know that I have been at the very least disturbed by the fact that your agency considered as "compliant" the mobile phones with SAR trunk measurements of more than 7 W/kg for 10 g of tissue. According to American and Canadian experts consulted and taking into account the current FCC rules for 1 g of tissue, this would amount to more than 21 W/kg in this case... What is the position of your agency in this respect? In addition, you indicate that the SAR measurements were carried out using a "maximum" call duration of 6 minutes, while the FCC recommends a 30 minute duration. What is the impact on the European standard compared to that of the United States and Canada?

Your answer is all the more important given that the one-year revision period of European Standard EN 50566 :2013 begun on 13 June 2016 ends today. To the best of my knowledge, no public information has been provided concerning the terms of the new regulation. What legal consequences do you draw from this for mobile phones sold in France from today and whose SAR values at contact are above threshold values?

I am available for any exchange or meeting that you would wish to have in order to go deeper into this topic that is so important to the health of French and European users.

Yours respectfully,

Dr. Marc Arazi