Comments on Opt-Out Program for the Advanced Metering System

- Barry Malowanchuk, Retired Professional Engineer (ex Manitoba Hydro) with 60+ years of Wireless experience

- Extensive Experience with Radio Frequency EMF Safety Issue
  - Guided Manitoba Hydro RF EMF Safety Program
  - Practice Personal Safety with Amateur Radio equipment 50 MHz to 241 GHz

Comments on Opt-Out Program for the Advanced Metering System

- From the Diameter Report the Health Canada website states “There are no health risks from exposure to radiofrequency EMF from smart meters”.

Health Canada has not done Long Term & Low Intensity exposure studies to determine the safety of radio frequency EMF.

Previously “Smoking/ Vaping / Asbestos/ UFFI were considered as Safe”

Comments on Opt-Out Program for the Advanced Metering System

- My Experience has shown that a small part of the population do have Hyper Sensitivity to Radio Frequency EMF radiation.

- The City of Winnipeg must accommodate people with this condition by providing a fulsome Opt-Out program!

- The COW should add the options in the Request for Proposal it would like to offer to householders who want to opt-out.

Comments on Opt-Out Program for the Advanced Metering System

- From the Diameter Report “Unlicensed frequency devices have a power limitation of 1W per transmission while licensed frequency radio transmitters can provide up to 2W of power. In addition, depending on the technology, **AMI radio transmissions can be less frequent and on a scheduled basis”**

This is not low power transmissions!

Safety cannot be assured.

As a Minimum can locations with “sensitive” occupants be configured for lowest frequency of transmissions with a minimum of transmitter power?

Comments on Opt-Out Program for the Advanced Metering System

- **From the Diameter Report "3.8.2. Radio Transmitter Location**

  To limit the amount of infrastructure required in a fixed network environment while maintaining daily read success rates, **Diameter recommends fixed network radio transmitters be located on the outside of the premises**."

- **"The Financial Model will assume that the radio transmitters will be located on the outside of premises."**

Is This Still the Case?

Final Comments on Opt-Out Program Recommendations for the Advanced Metering System

- **I support the recommendation from the Water, Waste & Environment Standing Committee on June 27, 2025 with the following modifications:**
  - **There should be No Cost to the Customer**
  - **The Option Should be Available When Moving to a New Residence**
  - **A Medical Letter signed by any Medical Doctor Registered in Canada**
- **The City should add the Options in the Request for Proposal it would like to offer to householders who want to Opt-Out.**