Response to HHS Request for Information

Wireless Radiation, EMF, and Health — Docket HHS-OASH-2026-0397

Federal Register Document No. 2026-19252 (September 21, 2026)

Dear Sir or Madam:

1. My Journey (Question 2 / 3)

I am responding as a 58-year-old man and as an individual with 40 years of experience with EHS.

Around 1986 I experienced the first sensations of the digital age. These began to intensify around 1990. I would describe it as the cooperation between my physical body and non-physical self (mental, emotional, and spiritual) diminishing, while I grew increasingly tired. At the time I was completely unaware of the presence of the digital world.

I then spent 15 years traveling from place to place asking where my complaints came from. I asked every specialist I could find: can you explain what is wrong with me? Each time the answer was the same: there is nothing. Which led me to think, there is nothing, and that is why I feel so unwell.

After 16 years I came across an energy practitioner. He explained, with complete accuracy, how I felt and what was troubling me. He made me aware of the presence of the digital world. My first thought was, see, I am not crazy, immediately followed by, do I have this?

After this realization, I spent about 15 years studying how the physical and non-physical work well together. Since there is no need to reinvent a well-designed wheel, I studied a great deal of old wisdom: what lessons did our ancestors learn that they considered important enough to write down for future generations? I also looked closely at quality of life, comparing Western and Eastern approaches. How can we integrate the Western and Eastern approaches into a new synergy?

With all the knowledge gained, I spent the last 10 years testing this in practice and renovating my home. I dismantled the 'EMF mountain' and worked on myself to become more aware of how to live with EMF. The key method I developed is restoring the rest/movement cycle, which in science is called entrainment. I will say more about this in section 3.

I have made a great deal of progress, but I still cannot comfortably tolerate the digital world. I am leaving out my personal EHS details to keep my account clear.

2. Reframing the Question (Question 16 / 17 / 18)

This consultation does not need to revolve around whether RF/EMF is harmful or not. The question that, in my view, yields more is: given what we know today about biology and technology, and the knowledge available to us, would we design our digital wireless world the same way if we were building it from scratch today? If not, what could be done better?

Today we stand with an EMF meter in our hand, and it goes off. But we know little to nothing about what that reading actually means. Perhaps there are 50 parameters within that reading that explain why the body, mind, and spirit struggle to function well under the radiation load present.

It is like going to an audiologist and establishing that someone cannot hear something, but then being unable to answer why that person cannot hear it. It depends on which discipline you view the RF/EMF question from. Every field has its own language, and different languages have difficulty understanding one another, sometimes to the point of near impossibility. Language shapes how we understand something, and applying it correctly is, in my view, the key to success.

Challenge 1: there is still so much that is unclear and not understood that this calls for a clear framework. Create a shared language framework in which all parties involved — proponents, opponents, the unaffected, the sensitive, technicians, experts, physicians, scientists, economists — can understand one another. Which words are preferable, which should be avoided, and are the right words available for every process involved. Such a framework could be the foundation on which different federal agencies and disciplines understand each other better.

In the remainder of this response, I explain why it is economically, scientifically, and practically worthwhile to approach this differently, and what concrete steps can be taken.

3. The Problem / The Scientific Premise (Question 5p / 12)

Anything that is constantly on consumes energy and, in doing so, continuously produces EMFs. Cell towers can already do this more intelligently: they can automatically lower their power output when usage is low (cell sleep mode), although this happens rarely today. I applied this same idea in my home: when there is no demand, the technology does not need to remain fully active. Technology that adapts to demand creates room for life that does not have to adapt. This also left room for rest at night — for the house, and for us.

The start of a new day should mark the beginning of a new cycle, a return to a zero reference point from which the body can rebuild. When the energy around us thunders on 24/7 like a highspeed train, we no longer reach that zero reference point.

Chronobiology tells us that the body synchronizes daily with rhythmic, cyclical signals, such as light and dark, a process known as 'entrainment.' When another signal runs through this continuously, without its own rhythm, it disrupts this synchronization. As with shift work, where research shows that recovery periods are not a luxury but a physiological necessity, the same principle applies when the environment itself never turns 'off.'

Compare it to an ecosystem: no system in nature can sustain itself without periods of rest, and humans and their living environment are no exception.

Challenge 2. Create an ambitious goal that excites everyone involved and benefits every resident of this planet. When the digital age was built, was sufficient attention paid to the laws of nature of this planet? Humanity has now gained forty years of experience with this world. This question has the right to be asked again! We do not need to fully understand these laws of nature before acting on them better now. If we approach this through the Pareto principle — 80% unaffected, 20% sensitive — the 20% can point to where the opportunities for optimization lie, ultimately benefiting everyone.

4. The Economic Argument (Question 18)

As additional information for this consultation, I would like to offer the following economic argument: is it economically worthwhile to better align our living environment with human wellbeing, in a way that also benefits health? Absolutely, and I can support this with my own experience.

I illustrate this with my own home (see table in appendix). Over the past two years, my household consumed an average of 1,180 kWh of electricity and 21,492 ft³ of gas, compared to a national average of approximately 2,810 kWh and 39,536 ft³ for a comparable home (built 1970–1975, two occupants, standard use). That is 58% less electricity and 46% less gas, achieved through deliberate control using simple and affordable technical solutions, without high-end equipment.

I was not looking for savings. I was looking for rest. The savings were the result, not the goal — and that distinction is exactly why it works.

My life partner asked me a question: could you design the house so that when we go to sleep, the house also comes to rest? I had to think about it for a moment, but I quickly saw the connection between conventional energy and digital energy, and used IoT technology* to switch off what did not need to keep running at night. Only later, on the year-end energy statement, did I see what that had saved. That led me to further optimize the rest/movement cycle, resulting in the outcome of the past two years.

If a single household can achieve this through deliberate control, what would be possible if this were applied at a societal scale, in terms of energy use and associated costs? That is not a small question: it concerns potential at the national scale, not an individual saving. Innovation in this area also brings new sources of revenue for the sector itself, which only increases the motivation to move forward, and can encourage other departments to move as well.

Better alignment between people and their living environment is not a concern for a small group, but a benefit for society as a whole. I will leave the connection to ever-rising healthcare costs to you. If nothing is done about this, I personally foresee a growing group of people who will disengage from society. In short, a person who can find rest in their living environment counts for two.

** = IoT technology is one of many small adjustments I have made in my home.*

5. From Problem to Solution (Question 5n / 5p / 17)

My contribution is this: turn a problem into a solution. Even if EHS were the greatest challenge of the 21st century, we should not approach it as a problem. A problem invites resistance and creates new problems. What is needed is an exciting challenge.

The Department of Energy has worked for decades on 'demand response': aligning energy supply and demand instead of maintaining constant full capacity. In the telecom sector, this approach already exists under names such as cell sleep mode and deep sleep, developed by suppliers such as Ericsson and Nokia. A 2025 trial by Vodafone UK and Ericsson in London achieved a 33% reduction in the daily power consumption of 5G radios, rising to 70% during quiet hours. A joint study by Nokia and Telefónica showed that 5G is up to 90% more energy-efficient than 4G per unit of data traffic.

This is therefore not a distant prospect: the technology exists and is already being deployed operationally elsewhere. In practice, however, settings often remain conservative, out of caution regarding coverage. This is also not new territory for DOE: in 2012, the Office of Energy Efficiency and Renewable Energy (EERE) already examined energy standards for network equipment (Docket No. EERE-2011-BT-NOA-0067). The fact that this did not move forward at the time may be explained by the technology not yet being sufficiently advanced. That docket could serve as a starting point for a renewed effort.

HHS's role here could be to support and accelerate this process by demonstrating that a less continuously demanding environment also benefits health. This adds a motive that did not exist in 2012, and, alongside the existing economic and environmental benefits (lower costs, reduced CO2 emissions), gives an additional reason to make settings less conservative.

There is also precedent for this kind of collaboration on the health side. From 1992 until the late 1990s, DOE and NIEHS (part of NIH) jointly coordinated the EMF-RAPID Program, with NIEHS designated as the lead agency for research and communication to policymakers. NIEHS could be the party that, building on this precedent, articulates an ambitious goal that excites everyone involved: less constant load, while maintaining coverage and service. Under the motto 'less is more.'

Once NIEHS has articulated this goal, DOE and FCC can indicate where they can and cannot get behind it. Reframing the question is not a request for defense, but an invitation to help build what is possible, for the benefit of public health.

The standard itself also deserves attention. Current FCC limits are defined for continuous exposure over an indefinite period, but averaging occurs over a window of only 6 to 30 minutes. What is missing is averaging over a longer period: a pattern that complies within every few-minute window can still repeat, uninterrupted, for years, without the standard addressing this at all. This is a question for FCC and FDA to examine further, alongside the question that can be posed to DOE: if the standard revolves around power and time, power that scales down based on demand could be just as much a solution as a stricter standard alone.

Should this approach be well received, one further question remains to be answered: who would be responsible? Energy efficiency for equipment generally falls under DOE, but telecom infrastructure is excluded from this, while FCC focuses on standards and licensing, not energy consumption. This gap in accountability could itself be worth further investigation.

Sincerely,

Working together, we will.

Appendix: Supporting Data on Energy Consumption (Section 4)

Semi-detached house built 1970/1975, 2 persons, standard conventional use

Year	Gas ft³	Electricity receiving kWh	6 solar panels generated kWh	Net consumption kWh (surplus)
2023 / 2024	21.346	1277	1386	-109
2024 / 2025	21.638	1083	1671	-588
average consumption	21.492	1180	1529	-349
Average national	39.536	2810	+/- 1530 / 1650	+400 / +700 (shortfall)
Average savings on national	46%	58%		