TO The U.S. Department of Health and Human Services (HHS)
Docket: HHS-OASH-2026-0397

REGARDING Request for Information (RFI) calling on Americans, scientists, physicians, industry, and public health experts to submit evidence and information on the potential health effects of electromagnetic fields (EMFs), radiofrequency (RF) radiation, and wireless radiation exposure.

COMMENTS OF WENDY POND
This filing provides comments from Wendy Rona Pond of Coromandel, New Zealand. As numerous telecommunication companies are transnationals, standards set in the United States of America are being advocated to other governments.

SUMMARY OF THIS SUBMISSION

This submission identifies four areas where there are gaps in necessary protection for long term public health.

Cell masts capable of RF transmission are being installed in residential streets—
1. Without long term effects having been proven safe for human and wildlife health; and
2. Without reported adverse effects having been avoided or remedied; and
3. Without the democratic agreement of residents living within reach and sight of the technology; and
4. Without adequate monitoring of transmission levels.

The regulatory authorities are failing to protect human and wildlife wellbeing in these four ways.
#

1. The technology has not been proven safe in the long term

Digital technology is pulsed. Human and wildlife biology is accustomed to natural radio waves and has little defence against the impact of intermittent pulses generated without relief by cell towers.

Therefore, digital technology must either be superseded or used with the greatest precaution.

A standard is not in itself proof of safety. The sources on which the authorities relied when setting the permitted level for RF transmissions, did not include studies of long-term effects. An abundance of studies and reports have urged the need for a revision of the standards in use.

In 2002, Dr Neil J Cherry, Associate Professor of Environmental Health at Lincoln University, concluded that the ICNIRP guidelines had "*ignored all published studies showing chromosome damage … The large number of published studies are a consistent and coherent set of evidence, that RF/MW is causally associated with reproductive and cancer effects, as well as altering and impairing brain function, reaction times, sleep and learning, and impairment of the immune system*."("Criticism of the Health Assessment in the ICNIRP Guidelines for Radiofrequency and Microwave Radiation (100kHz - 300 GHz)". Report to the Ministry of Health and Ministry for the Environment of New Zealand, 21 September 2002. https://neilcherry.nz/wp-content/uploads/2021/05/90_m4_EMR_ICNIRP_critique_09-02.pdf)

Nonetheless, WHO has continued to advocate the ICNIRP standard.

A newsletter of the Institute of Electrical and Electronics Engineers (IEEE) stated the industry's position in 2024: "*The sporadic protests over 5G network deployments and their impact on human health have not slowed down the global rollout of the newest generation of cellular technology. … But by and large, rigorous, widespread research into the impacts on human health have never been undertaken. …* ***the health impacts of 5G — now well into its fifth or sixth year of operation in large areas of the globe — remains unknown****.*" ("Will 5G be bad for our Health?" *IEEE Spectrum,* 2024, https://spectrum.ieee.org/will-5g-be-bad-for-our-health)

2. **Adverse effects on health not avoided, not remedied**

The authorities have been provided with a thousand documents recording ill health effects in residents who live within a quarter mile of a cell mast. There needs to be a requirement for the telecommunication companies to monitor health effects and to provide periodic reports on household health in the streets where they place their utilities.

These are issues of public concern regarding positioning of cell masts in residential areas:

1. The telecom companies are not required to remedy loss of good health, nor pay for shielding materials to avoid effects, nor compensate loss of pleasure in life.
2. There is no provision for the public to have rights of objection to the choice of site for a cell mast, nor rights to compensation and fair settlement.
3. Recourse to legal processes is beyond the means of most households. That is, the costs of shielding materials, re-designing bedrooms where children sleep, and "leaving all fair" should fall on the telecommunication companies and not on the householder.

3. **Affected residents not consulted**

Placement of a cell mast outside a home may bring about loss of street character, drop in property valuation, and dismay in householders who find their children, spouses, and pets become irritable and ill.

Under present legislation it is the telecommunication companies alone who may decide where to place a cell mast. There is no consultation: residents are not included in the decision of where to place a cell mast.

The health of residents is not monitored: householders are not provided with a pathway to report effects on family health.

An assessment needs to be made of the disparity between the levels of RF transmission permitted in America and the more cautious levels provided to citizens in Russia, China, Italy, and further afield. A sound explanation needs to be given to the public for this disparity.

Through absence of responsibility for public well being, and through disregard of public wishes, **the authorities are denying the public control of our own health**.

4. **Inadequate monitoring of RF transmission levels**

The agencies responsible for monitoring transmission levels are not effectively protecting public health. Pulses recorded by the public are reaching levels many times greater than the permitted levels. During July 2023 residents in Pagitt Street Coromandel town recorded pulses from a cell

mast that were greater than permitted, and even with notification to the authorities, the excess has continued. Thames Coromandel District Council NZBN-9429041920145 was advised by residents,

"*According to our research — The International Commission on Non-ionizing Radiation Protection (ICNIRP) and World Health Organisation (WHO) published maximum exposure levels in New Zealand:*

Radiofrequency Electric Field Voltage per meter (V/m):
41.25 V/m = 4.5 W/m2

Upon investigation using a "Smart Sensor ST1393 Electromagnetic Field EMF Detector' within 10 meters of the Edward Pagitt St Coromandel tower on 15th July 2023 we now report our findings:

Radiofrequency Electric Field Voltage per meter (V/m):
1992 V/m = 10557.09 W/m2"

(Copied from *Proclamation,* delivered by hand to Thames Coromandel District Council and bearing Council's stamp of receipt 01 AUG 2023.)

The Pagitt Street transmission is owned by Infratil, a transnational company operating in the US that describes its infrastructure assets as "the critical building blocks of digital connectivity and data storage". HHS is not fulfilling its democratic duty to provide the public with scientific evidence that long term effects are controlled; that the adopted standard protects our health; and that transmission is adequately monitored.

CONCLUSION The authorities are currently permitting installation of a technology that has not been proven safe for human and wildlife health in the long term, and whose various effects are not remedied and not compensated for.

In its failure to advocate for the four measures above, HHS is denying the public control of our own health.

Dated: 27 September 2026

Ngā mihi,

Wendy Pond
2225 Wyuna Bay Road
Coromandel 3581
New Zealand