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Judy Schriebman 3 Poco Paso San Rafael, CA 94903

April 29, 2020

To: FCC

Subject: RE: rules for exposure to over 6 GHz

Dear FCC:

I am absolutely appalled that you are considering massively irradiating people without regard for public health or safety. Your own case, that if a small dose is fine, these larger doses must therefore be fine, flies the face of logical reasoning and would never get past any parent if given them by a teenager. This is where public health and safety, which are government priorities, do and must take priority over the commerce clause or business as usual.

I am a mom, university trained in zoology and graduate level in alternative health care and an elected official. The level of gross neglect in the FCC is something that would never have passed muster for any of the jobs I have ever had. The level of poor judgement, false reasoning, and neglect of duty to protect the public is beyond the pale.

While I have not personally been injured by EMFs, I have several close friends who have been injured and continue to be injured when in an unsafe environment where EMFs are there. Like the canary in the coal mine, these people are showing that not everyone can tolerate this level of EMFs and this should be and is a HUGE red flag telling us to slow down and find out what's really happening. Babies, growing children and pregnant women in particular might be way more affected by this radiation than adults. While we forbid human testing, when you roll out something untried and untested, **you are essentially doing human testing on a massive scale without consent of the people being tested**. This is wrong. It is also illegal.

We have not had adequate safety testing to determine safe levels, if safe levels even exist. I am not comfortable with a profit-motive driven company to have done anything resembling adequate testing, or be telling the truth. We have seen all too often that the information is buried and not given to the government by corporations.

Here are other considerations that need to be taken into account:

- The **denial of non-thermal effects**; the use of **averaging** to take measurements instead of **peaks which cause effects**; the idea that for very high frequencies **little penetration equals little harm**; the idea that **harm to the skin is no harm**; the erroneous FCC focus on **power and heating versus pulsation and modulation** which are the determining factors of biological effects.

- **SAR** which looks at radiation absorption in the human body will **NO** longer be used as with under 6 GHz. Instead, **Power Density will be used** which focuses on emission from devices and antennas which allows for higher exposures than SAR.

- The under **1-Milliwatt blanket Exemption** along with other exemptions are frightening, especially the environmental evaluation section. It is known that migrating birds, fish and

insects are affected and can lose their ability to know where they are with cell phone tower radiation. I have my degree in Zoology, but this is broadly known to be true.

- The assumption that **without any safety testing that below 6 GHz is currently safe**; therefore **above 6 GHz all the way up to 3,000 GHz is also safe. This is patently false and dangerously false reasoning. We have not had safety testing at all because of the FCC's unethical pattern of putting business interests ahead of the health and safety of American citizens.**

- These new rules will violate Americans with Disabilities Act or **ADA and FHAA** or Federal Fair House Amendments Act

- **The FCC industry is industry captured and biased**. FCC is even **unqualified** to assess the value and usefulness of these comments. **FCC is unqualified to determine exposure levels** because of the lack of health and safety dept and staff with degrees and specialized training in biological sciences. **FDA lacks expertise and biologically based safety testing** to make this determination. Advice from FDA is faulty because **Jeffrey Shuren MD, Director of Devices and Radiological Health at FDA GROSSLY conflicted** with his wife Allison Shuren partner at law firm Arnold & Porter who has handled more than $200 billion worth of business for AT&T. **He should recuse himself** rather than lead the way as he is now saying our existing guidelines are adequate and there are no non-thermal biological and health effects to prevent.

- An assumption that **children are just little adults** is just so wrong in every way an ordinary normal person understands, it shows that the FCC is no longer functioning at any level of competence, and again points to being a captured department, run by corporate interests.

I sincerely hope that someone reading these comments will find their moral compass and speak out and deny any new rules or regulations that make it possible to potentially poison more people without their knowledge or consent, and without any way for them to escape being poisoned. This experiment needs to be shut down.