FCC 12-152

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Notice of Proposed Rulemaking	)	
18 FCC Rcd 13187, 13188 ¶1 (2003)	)	ET Docket No. 03-137
	)	
And	)	
	)	
Service Rules for the Advanced Wireless Services	)	WT Docket No. 12-357
H Block---Implementing Section 6401 of the	)	
Middle Class Tax Relief and Job Creation Act of	)	
2012 Related to the 1915-1920 MHz and	)	
1995-2000 MHz Bands ¶53 footnote 95	)	

To: Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Comment Filed by: (Andrew Swerling)
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February 5, 2013

AFFIDAVIT OF Andrew Swerling

State of Washington]

_King_____ County]

I, Andrew Swerling attest that my statements are true to the best of my knowledge.

Comment round for ET Docket No. 03-137 and WT Docket No. 12-357.

1. My name is _Andrew Swerling_____ . My address is_17202 NE 85 Place, Apt 1H-216, Redmond, WA 98052.

2. I am a consultant on computer issues

3. I am an individual who is very sensitive to electromagnetic radiation. Approximately a year ago, I began having symptoms of headaches, dizziness and nervous system problems. Like most people, I had a cordless phone and a wireless modem near my computer. I had no idea of the risks posed by these devices to my health. When I measured the EMR emitted by these devices, the readings were greater than 2,000 microwatts/m2 for each of these devices. As soon as I turned these devices off, I immediately started feeling better.

4. I find it difficult to do my work since all of the computing devices I must use emit substantial amounts of EMR. I consider this a potential workplace hazard.

5. Dozens of scientific studies have shown negative impacts of EMR on human health, even at low levels of exposure. The most commonly accepted guidelines are the Building Biology recommendations that list 1,000 microwatts/m2 as the threshold for "extreme concern" (http://www.baubiologie.de/downloads/english/richtwerte_2008_englisch.pdf). On May 31, 2011, the World Health Organization's International Agency for Research on Cancer (IARC) classified radiofrequency fields as "possibly carcinogenic to humans." The FCC does not use biologically determined guidelines that affect health, but rather uses a standard that measures thermal heating of biological tissue. The premise that

there are no adverse impacts of EMR on the human body until it is cooked is inconsistent with my experience.

6. For these reasons, I am dismayed by the continual introduction of new mechanisms using EMR that exacerbate the problem. Based on my understanding, this expansion of EMR is being done with no consideration of the impact to human health because it is happening either in open bands like 900MHz or 2.4GHz or in regulated bands supporting functions like LTE cellular. I believe the government should consider human health when issuing licenses to emit EMR.

7. I urge the FCC to adopt new RF safety guidelines that take into account published research on the biological effects brought on by the ability of RF signals to communicate with living tissue, and more specifically, to consider the Building Biology guidelines for human health. I further urge the FCC to work with OSHA to establish guidelines around workplace exposure for EMR.

Respectfully submitted by

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February 5, 2013

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