Rationale for Reassessment of the RF Safety Guidelines

In light of the continuing lack of uncertainty on the safety of RF exposures *http://www.fcc.gov/guides/wireless-devices-and-health-concerns*, and lack of worldwide research consensus on the health impacts of RF products, I ask this FCC to open up debate of the adequacy of current RF standards to protect public health and the environment, especially our children.

Included in this review should be a review of FCC current emission monitoring program, its sufficiency and insufficiency to provide adequate oversight in monitoring the emission of this country's RF installations and product deployments.

The FCC admits it is not a health agency and claims it defers to other health agencies in the government to offer guidance on the subject. When the other health agencies, EPA, FDA have shirked this responsibility over the last 13 years, during our greatest growth and penetration of RF wireless products the public can take little comfort that any agency of government is truly considering the health and safety of this nation and more vulnerable in our population including, children, elderly, and those with chronic and acute illnesses from RF overexposure

One of the more pivotal Federal documents in the last 10 years that points to the rationale for reevaluating our RF safety standards is the 2008 National Institute of Health document entitled "Identification of Research Needs Relating to Potential Biological and Adverse Health Effects of Wireless Communications". Although the documents main intent was to call for more research based on its review of the scientific evidence at the time, it pointed out one of the most glaring gaps in the research up to 2008 and continuing to the present :

> *"there is a need to characterize exposure of juveniles, children, pregnant women, and fetuses both for personal wireless devices (e.g., cell phones, wireless personal computers [PCs]) and for RF fields from base station antennas. This characterization includes taking into account gradients and variability of exposures due to the actual use of the device, the environment in which it is used, and exposures from other sources, multilateral exposures, and multiple frequencies. The data thus generated would help to define exposure ranges for various groups of exposed populations.*

Please Read the whole "Dosimetry and Exposure" section to fully understand why our current FCC guidelines and negative research findings are insufficient and cannot offer assurance that the public is being protected from the toxic effects from increasing variety of RF exposures and frequencies on a 24 hour, daily basis.

Perhaps recent High Court of India decision sums it best up why it is paramount that the FCC revaluate the current standards and guidelines After taking into account and examining Industry evidence pointing to a lack of scientific evidence that current public exposures to RF are harmful, and defendants evidence (State of Rajasthan and the harmed individuals) that shows the health and environmental effects of RF, the Court agreed to support the State's newly restricted laws for RF installation. It allowed the State to restrict cell tower installations away from schools, hospitals, high density areas, parks and permitted the state to proceed

taking those cell towers down that do not conform to the new law. It took into serious consideration fear from cellular providers would not suffer from insufficient coverage. The prescient point that sums up the Court's decision is as follows: (p. 177)

> *"…… precautionary approach has to be adopted in such matter and thus, the decision taken by the State Government is in accordance with the dictum laid down by the Apex Court in the case of M.C.Mehta Ws Union of India & ors. (supra) wherein it has been held that even in case of reasonable suspicion or doubt, precautionary principle requires anticipatory action to be taken to prevent harm.* ***Lack of scientific certainty and direct evidence of harm cannot come into the way so as to take preventive measures.***

FCC has asked that a dollar figure be provided for costs and benefits of reassessing the adequacy of Current standards. I find this appalling. Certainly this is possible in terms of health costs, lost income and perhaps loss to the productivity of the population over time, but it should not be the responsibility of an individual or individuals with limited income to come up to the numbers that Telecom industry can financially furnish to support its position to weaken the standards.

In 1965 the Supreme ruled in **(*Scenic Hudson v. Federal Power Commission)***

> *If the Commission is properly to discharge its duty in this regards, the record on which it bases it determination must be complete. The petitioners and the public at large have a right to demand this completeness. . . the public is entitled to know on the record that no stone has been left unturned…..****A regulatory commission can insure continuing confidence in its decisions only when it has used its staff and its own expertise in manner not possible for the uninformed and poorly financed public. …….****In this case, as in many others, the Commission has claimed to be the representative of the public interest. This role does not permit it to act as an umpire blandly calling balls and strikes for adversaries before it; the right of the public must receive active and affirmative protection at the hands of the Commission.*

Under NEPA, "*federal officials are required to assume the responsibility that the Congress recognized . . . as the obligation of all citizens: to incorporate the consideration of environmental factors into the [federal] decision-making process."* This points to one more reason why Telecommunications Act is clearly in violoation of the law in its Section 704, a law that has taken precedence over every other state or local action that desires to be more proactive and preventtive of its community environment and public health from RF exposures.

Monetizing My Personal Experiences from RF Expsoure;

Although I cannot put a dollar figure on my loss of income I can certainly account how much it has compromised my earning potential. I cannot assess my loss of health for I am relatively healthy because I took the warning signs that my body was giving me to RF/EMF radiating devices as a indicator to change my lifestyle and become more proactive about reducing my exposure.

My problems began over 20 years ago when I was in grad school for Urban planning, hoping to start a new career where I could finally envision gaining sizable new income from my present limited work potential . It was then through a series of trial/error and eliminations did I discover I had a sensitivity to electromagnetic fields of varying frequencies and powers. Only when I could remove myself from the growing umbrella of RF & other EMf frequencies could I be more productive, think more clearly and sleep better. With the growing proliferation of RF devices and this final understanding of my limited ability to participate in this growing wireless and technological revolution, have I suffered immeasurably in sufficient income generating endeavors, and a stable home environment.

My life has been turned upside down. I live almost a nomadic life trying to find a peaceful place to rest and sleep. I was never to realize my dream as an urban planner for after considerable accommodations by my professors to be able to limit my computer use, I was not able to work for more than 2 years after graduation, at which time working continuously in front of a computer and living close to broadcast towers made my health suffer, reflected in rising blood pressure and loss of hand circulation from use of a computer. I had to completely quit urban planning profession to see my blood pressure return to normal. My sleep never improved until I moved far away from all the antenna farms in my area. This was over 14 years ago.

I tried going back to teaching on a more limited bases, but schools have now become a wireless nightmare, once again limiting my ability to work. I would feel dizzy and unfocused as the radiation levels increased.

I have moved over 7 times in the course of 13 years, always trying to find a more peaceful setting. My income from some inheritance has become greatly depleted. My social security is very limited due to my short work career.

My current living environment is not ideal, but its become all I can afford, I live in a mother-in-law where the homeowner is not necessarily electro-sensitive but shares my interest in lowering Rf exposures, so she does not use WIFI in the home at all, and has agreed to turn off all cellular devices when in the home. For this I am trully grateful. The mother-in-law is in a concrete basement with little light, but the concrete offers some mitigation from high outside RF exposures.

I have been forced to spend considerable dollars on RF metering devices, some of which work well while others don't in order to better assess my living environment and understand why at times I am unable to rest properly. Some of those meters have been a godsend.

I yearn for the day I can live free of outside RF interferences as I once did, in housing of my own choosing and work that can gain me some income and more predictable association with my family and others.

Conclusion:

I ask this commission to fully appreciate that Telecom players are not the only sector of society that must be considered in the development of our RF safety standards. Whether many scientific studies like to point to the fact we are imagining are symptoms as EMF/RF induced, the number and level of studies that point to RF/EMF contributing to a series of cellular and health disorders is numerous and growing and should be sufficient in opening up the debate on RF safety guidelines

Preponderance of evidence should not be the overriding factor for evaluating the need to reassess the Rf safety guideline. A potential emission and toxin that is so ubiquituous , invisible to the naked senses, and unpredictable in isolating its effects, should be evaluated for no other reason than 100s of studies from all corners of this world have shown the health and biological adverse effects that can occur from its exposure.

The EPA should be designated to review and reassess thoroughly the Health impacts of Wireless radiation and to determine future Research needs.

The FCC should proceed at limiting exposure for vulnerable population, children, etc.

The FCC should seriously consider allowing local and state bodies the ability to designate areas of land and wireless free zone to give those who wish not to be overly exposed to this form of radiation a chance to live a more productive life.

The FCC should give more authority to the states to rule on its criteria to protect public health from RF exposure.

For Review of the Scientific research:
www.bioinitiative.org
http://www.biolmedonline.com/Articles/Vol4_4_2012/Vol4_4_202-216_BM-8.pdf
https://docs.google.com/document/d/1mEFSvE4XMbrr2N7NYANhXhD3D_8r1EY9STjoSul4aW4/edit