

Assessment of Radiofrequency Microwave Radiation Emissions from Smart Meters

Sage Associates
Santa Barbara, CA
USA

January 1, 2011

TABLE OF CONTENTS

SUMMARY OF FINDINGS

INTRODUCTION

- How Smart Meters Work
- Mandate
- Purpose of this Report
- Conditions that Affect Radiofrequency Radiation Levels from Meters
- Framing Questions

HOW THEY WORK –
- Mesh Network
- Smart Meter(s) and collector meters
- Power Transmitters

METHODOLOGY

APPLICABLE PUBLIC SAFETY LIMITS

- FCC Bulletin OET 65 Guidelines (Time-Averaging Limits)
- ANSI/IEEE C95.1-1992, 1999 (Peak Power Limits)

RESULTS, FINDINGS AND CONCLUSIONS

- Tables 1-6 RF Levels at 6”, 11” and 28” (Face, Nursery, Kitchen)
- Tables 7-17 (FCC Violations of TWA and Peak Power)
- Tables 18-31 (Comparison of RF Levels to Health Studies)
- Tables 32-33 (Comparison to BioInitiative Recommendation)
- Tables A1- A16 (RF Power Density vs Distance Tables)
- Tables A17-A32 (Nursery at 11” Summary Tables)
- Tables A33-A48 (Kitchen at 28” Summary Tables)

APPENDIX A – Tables A1 – A16 RF Power Density vs. Distance Tables
Tables A17-A32 (Nursery at 11" Summary Tables)
Tables A33-A48 (Kitchen at 28" Summary Tables)

APPENDIX B – Tables 1 – 33 - Data Tables, FCC Violation Tables, Health Comparisons

APPENDIX C – Sensitivity of the Eye and Testes to RF Radiation

SUMMARY OF FINDINGS

This Report has been prepared to document radiofrequency radiation (RF) levels associated with wireless smart meters in various scenarios depicting common ways in which they are installed and operated.

The Report includes computer modeling of the range of possible smart meter RF levels that are occurring in the typical installation and operation of a single smart meter, and also multiple meters in California. It includes analysis of both two-antenna smart meters (the typical installation) and of three-antenna meters (the collector meters that relay RF signals from another 500 to 5000 homes in the area).

RF levels from the various scenarios depicting normal installation and operation, and possible FCC violations have been determined based on both time-averaged and peak power limits (Tables 1 - 14).

Potential violations of current FCC public safety standards for smart meters and/or collector meters in the manner installed and operated in California are

predicted in this Report, based on computer modeling (Tables 10 – 17).

Tables 1 – 17 show power density data and possible conditions of violation of the FCC public safety limits, and Tables 18 – 33 show comparisons to health studies reporting adverse health impacts.

FCC compliance violations are likely to occur under normal conditions of installation and operation of smart meters and collector meters in California. Violations of FCC safety limits for uncontrolled public access are identified at distances within 6" of the meter. Exposure to the face is possible at this distance, in violation of the time-weighted average safety limits (Tables 10-11). FCC violations are predicted to occur at 60% reflection (OET Equation 10 and 100% reflection (OET Equation 6) factors*, both used in FCC OET 65 formulas for such calculations for time-weighted average limits. Peak power limits are not violated at the 6" distance (looking at the meter) but can be at 3" from the meter, if it is touched.

This report has also assessed the potential for FCC violations based on two examples of RF exposures in a typical residence. RF levels have been calculated at distances of 11" (to represent a nursery or bedroom with a crib or bed against a wall opposite one or more meters); and at 28" (to represent a kitchen work space with one or more meters installed on the kitchen wall).

FCC compliance violations are identified at 11" in a nursery or bedroom setting using Equation 10* of the FCC OET 65 regulations (Tables 12-13). These violations are predicted to occur where there are multiple smart meters, or one collector meter, or one collector meter mounted together with

several smart meters.

FCC compliance violations are not predicted at 28" in the kitchen work space for 60% or for 100% reflection calculations. Violations of FCC public safety limits are predicted for higher reflection factors of 1000% and 2000%, which are not a part of FCC OET 65 formulas, but are included here to allow for situations where site-specific conditions (highly reflective environments, for example, galley-type kitchens with many highly reflective stainless steel or other metallic surfaces) may be warranted.*

*FCC OET 65 Equation 10 assumes 60% reflection and Equation 6 assumes 100% reflection. RF levels are also calculated in this report to account for some situations where interior environments have highly reflective surfaces as might be found in a small kitchen with stainless steel or other metal counters, appliances and furnishings. This report includes the FCC's reflection factors of 60% and 100%, and also reflection factors of1000% and 2000% that are more in line with those reported in Hondou, 2001; Hondou, 2006 and Vermeeren et al, 2010. The use of a 1000% reflection factor is still conservative in comparison to Hondou, 2006. A 1000% reflection factor is 12% (or 121 times as high) a factor for power density compared to Hondou et al, 2006 prediction of 1000 times higher power densities due to reflection. A 2000% reflection factor is only 22% (or 441 times) that of Hondou's finding that power density can be as high as 2000 times higher.

In addition to exceeding FCC public safety limits under some conditions of installation and operation, smart meters can produce excessively elevated RF exposures, depending on where they are installed. With respect to absolute RF exposure levels predicted for occupied space within dwellings, or outside areas like patios, gardens and walk-ways, RF levels are predicted to be substantially elevated within a few feet to within a few tens of feet from the meter(s).

For example, one smart meter at 11" from occupied space produces somewhere between 1.4 and 140 microwatts per centimeter squared (uW/cm2) depending on the duty cycle modeled (Table 12). Since FCC

OET 65 specifies that continuous exposure be assumed where the public cannot be excluded (such as is applicable to one's home), this calculation produces an RF level of 140 uW/cm2 at 11" using the FCCs lowest reflection factor of 60%. Using the FCC's reflection factor of 100%, the figures rise to 2.2 uW/cm2 – 218 uW/cm2, where the continuous exposure calculation is 218 uW/cm2 (Table 12). These are very significantly elevated RF exposures in comparison to typical individual exposures in daily life. Multiple smart meters in the nursery/bedroom example at 11" are predicted to generate RF levels from about 5 to 481 uW/cm2 at the lowest (60%) reflection factor; and 7.5 to 751 uW/cm2 using the FCCs 100% reflection factor (Table 13). Such levels are far above typical public exposures.

RF levels at 28" in the kitchen work space are also predicted to be significantly elevated with one or more smart meters (or a collector meter alone or in combination with multiple smart meters). At 28" distance, RF levels are predicted in the kitchen example to be as high as 21 uW/cm2 from a single meter and as high as 54.5 uW/cm2 with multiple smart meters using the lower of the FCCs reflection factor of 60% (Table 14). Using the FCCs higher reflection factor of 100%, the RF levels are predicted to be as high as 33.8 uW/cm2 for a single meter and as high as 85.8 uW/cm2 for multiple smart meters (Table 14). For a single collector meter, the range is 60.9 to 95.2 uW/cm2 (at 60% and 100% reflection factors, respectively) (from Table 15).

Table 16 illustrates predicted violations of peak power limit (4000 uW/cm2) at 3" from the surface of a meter. FCC violations of peak power limit are predicted to occur for a single collector meter at both 60% and 100%

reflection factors. This situation might occur if someone touches a smart meter or stands directly in front.

Consumers may also have already increased their exposures to radiofrequency radiation in the home through the voluntary use of wireless devices (cell and cordless phones), PDAs like BlackBerry and iPhones, wireless routers for wireless internet access, wireless home security systems, wireless baby surveillance (baby monitors), and other emerging wireless applications.

Neither the FCC, the CPUC, the utility nor the consumer know what portion of the allowable public safety limit is already being used up or pre-empted by RF from other sources already present in the particular location a smart meter may be installed and operated.

Consumers, for whatever personal reason, choice or necessity who have already eliminated all possible wireless exposures from their property and lives, may now face excessively high RF exposures in their homes from smart meters on a 24-hour basis. This may force limitations on use of their otherwise occupied space, depending on how the meter is located, building materials in the structure, and how it is furnished.

People who are afforded special protection under the federal Americans with Disabilities Act are not sufficiently acknowledged nor protected. People who have medical and/or metal implants or other conditions rendering them vulnerable to health risks at lower levels than FCC RF limits may be particularly at risk (Tables 30-31). This is also likely to hold true for other

subgroups, like children and people who are ill or taking medications, or are elderly, for they have different reactions to pulsed RF. Childrens' tissues absorb RF differently and can absorb more RF than adults (Christ et al, 2010; Wiart et al, 2008). The elderly and those on some medications respond more acutely to some RF exposures.

Safety standards for peak exposure limits to radiofrequency have not been developed to take into account the particular sensitivity of the eyes, testes and other ball shaped organs. There are no peak power limits defined for the eyes and testes, and it is not unreasonable to imagine situations where either of these organs comes into close contact with smart meters and/or collector meters, particularly where they are installed in multiples (on walls of multi-family dwellings that are accessible as common areas).

In summary, no positive assertion of safety can be made by the FCC, nor relied upon by the CPUC, with respect to pulsed RF when exposures are chronic and occur in the general population. Indiscriminate exposure to environmentally ubiquitous pulsed RF from the rollout of millions of new RF sources (smart meters) will mean far greater general population exposures, and potential health consequences. Uncertainties about the existing RF environment (how much RF exposure already exists), what kind of interior reflective environments exist (reflection factor), how interior space is utilized near walls), and other characteristics of residents (age, medical condition, medical implants, relative health, reliance on critical care equipment that may be subject to electronic interference, etc) and unrestrained access to areas of property where meter is located all argue for caution.