October 19, 2026

Comments of Lisa Smith, owner of EMF Wellness Tucson

Department of Health and Human Services Request for Information on "electromagnetic field (EMF) exposure and human health", submitted to Docket HHS-OASH-2026-0397

Re: Child exposed to excessive RF radiation from a T-Mobile rooftop cell tower

My name is Lisa Smith, and I'm a Building Biology certified Electromagnetic Radiation Specialist (EMRS). Part of my job is to measure the levels of Radio Frequency (RF) radiation in homes and schools, compare measured levels to safety guidelines and, if levels are unsafe, identify the source. I then give recommendations for mitigation.

The safety guidelines I employ were established by the Building Biology profession based on the science of human biological effects of RF radiation. Measured in microwatts per meter-squared (uW/m^2), they are as follows:

No Concern	Slight Concern	Severe Concern	Extreme Concern
<0.1	0.1 - 10	10 – 1,000	>1,000

Source: Building Biology Evaluation Guidelines for sleeping areas (SBM-2015).

I would like to bring your attention to an assessment I conducted where a young child was living with her family on the top floor of an apartment building on which a rooftop T-Mobile cell tower was installed. I was called in because after the tower was "upgraded to 5G", the child started to have headaches, sinus and ear infections, sleep problems, and difficulties learning at school.

My measurements found that the level of RF radiation in the child's bedroom was extremely high, at 616,000 uW/m^2, 616 times above the Extreme Concern cut-off of the Building Biology guidelines. The levels also fell far above the maximum legal exposure limits of numerous countries: China, Russia, Italy, France, Poland, Hungary, Switzerland, Belgium, Bulgaria, Luxembourg, Ukraine, Lichtenstein and Austria.

The testimony of the child's mother can be found at this link:
https://www.emf-wellness.com/kerrys-story

Unable to receive assistance from local officials, the family was forced to relocate.

I attach my report of the assessment, which gives details of the home, the cell tower and my RF radiation measurements. Appendix 2 contains peer-reviewed studies of the biological and adverse health effects of exposure to RF radiation from the 2020 update of the Bioinitiative Report.

I also want to bring to the Department's attention the most recent review of the science on the impacts of RF radiation on children's health from the International Commission on the Biological Effects of Electromagnetic Fields (ICBE-EMF), which can be found at this link:

https://icbe-emf.org/wp-content/uploads/2026/09/ICBE-EMF-Child-Health-Cell-Phone-Cell-Tower-EMF-Position-Statement-PDF-982026.pdf

The review points to children's unique vulnerabilities, stating that research on cell tower radiation has found that children's brains can absorb RF radiation at rates 25 to ~50% greater than adults. This unique vulnerability is not currently taken into account in Federal Communications Commission RF radiation exposure limits.

I request and recommend that children's unique vulnerability be considered in future RF radiation limit setting by the U.S. government so that the kind of unjust suffering seen in this example is not allowed.

Sincerely,

Lisa Smith, PhD, EMRS