October 20, 2026

RE: Request for Information on Electromagnetic Fields (EMFs), Radiofrequency (RF) Radiation, and Wireless Radiation Exposure

Docket: HHS-OASH-2026-0397

Department of Health and Human Services:

NATE: The Communications Infrastructure Contractors Association (NATE) supports a science-based, evidence-driven approach to evaluating radiofrequency (RF) energy and electromagnetic field (EMF) exposure and encourages the Department of Health and Human Services to rely on the best available scientific evidence, established exposure limits, and recognized safety standards when evaluating potential policy changes.

NATE recognizes RF energy as a known occupational hazard for communications tower technicians working on wireless and broadcast infrastructure and supports continued research into RF/EMF exposure and human health. At the same time, any future regulatory actions should be grounded in credible scientific evidence and informed by the demonstrated effectiveness of existing industry safety practices.

The communications infrastructure industry has established comprehensive protocols to identify, monitor, and mitigate potential RF exposure risks. These practices include extensive RF safety training, site-specific RF safety plans, use of calibrated RF monitoring equipment, adherence to applicable occupational exposure limits, coordination with wireless carriers and broadcast operators to reduce power or implement Lock Out/Tag Out procedures when antennas must be de-energized, and the use of appropriate personal protective equipment and RF monitoring devices. The industry also follows recognized consensus standards, including the RF safety provisions contained in ANSI/ASSP A10.48, which establish requirements and guidance for safe work practices when performing activities on telecommunications structures where RF exposure may occur.

Industry performance data demonstrates the effectiveness of these controls. Through the NATE STAR Initiative Safety Audit Program, more than 2,011 RF-specific safety audits have been conducted over the past five years by participating companies. These audits identified RF deficiencies at just 1.6 percent of audited sites. Importantly, only one deficiency (1 percent) was classified as critical, and only six deficiencies (4 percent) were classified as high severity, demonstrating that significant RF safety violations remain exceedingly rare throughout the industry. Furthermore, corrective actions resulting from the audit process have been addressed at a 94.3 percent completion rate, illustrating the industry's strong commitment to continuously identifying and resolving potential hazards before they result in worker exposure or incidents.

The NATE STAR Initiative audit program places significant emphasis on proactive hazard mitigation before work begins at a site. This includes verification that RF monitors are calibrated and operational, site-specific RF plans are available and accessible, RF hazards are properly identified, and employees have current RF safety training. These measures reflect a mature safety culture that prioritizes prevention and accountability while reinforcing compliance with established safety requirements. The audit data

confirms what industry stakeholders have long recognized: communications infrastructure employers and employees take RF safety seriously and maintain rigorous processes designed to prevent exposure incidents before they occur.

NATE believes these established controls, industry training programs, recognized consensus standards, and ongoing compliance verification efforts provide an effective framework for protecting workers and should remain central to regulatory and public policy discussions. The industry's strong safety performance record, combined with the rarity of documented RF-related worker incidents, demonstrates that existing safeguards are functioning as intended. Accordingly, any changes to existing RF exposure standards or requirements should be supported by credible scientific evidence, reflect established occupational safety practices, and demonstrate a clear and measurable benefit to worker safety and public health.

NATE also encourages policymakers to distinguish between the presence of RF energy and scientifically demonstrated adverse health effects resulting from exposure within established safety limits. Regulatory decisions should be based on sound science and risk analysis rather than precautionary assumptions unsupported by evidence. Policymakers should also carefully consider the potential consequences of imposing unnecessary regulatory burdens on the communications infrastructure industry, including tower owners, wireless providers, broadcast operators, and the highly skilled workforce responsible for building, maintaining, and modernizing America's communications networks. Such burdens could impede broadband deployment, network resiliency, public safety communications, and ongoing investment in critical digital infrastructure without providing a corresponding public health benefit.

For these reasons, NATE urges the Department to continue relying on established scientific research, recognized occupational safety standards, and demonstrated industry safety performance when evaluating RF/EMF-related policies and regulations.

Sincerely,

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