Re: Department of Health and Human Services - Request for Information on Electromagnetic Fields (EMFs), Radiofrequency (RF) Radiation, and Wireless Radiation Exposure

DECLARATION of Ruth F. Moss

I, Ruth F. Moss, declare under penalty of perjury, that the following statements are true, accurate, and within my personal knowledge:

1. I reside in Westchester County, NY.
2. I am a former Sr VP, Creative Advertising Director, and lyricist. In 2008, I was working on a promising musical project when I began to experience flu-like symptoms, dizziness, and intense fatigue on a daily basis. I consulted with several doctors, none of whom who could diagnose the problem or resolve my symptoms.
3. Yet I knew something was terribly wrong. I concluded that I was suffering from a rare illness… even left a letter in my desk drawer telling my family I loved them… in case something grave happened to me. Unbelievably, it took me 7 years to connect the dots back to the digital utility meter that had been installed on my house at the same time my symptoms began. Specifically, this meter was an AMR digital utility meter that emitted radiofrequency (RF) radiation 24/7 through the wiring of my house.
4. The connection I made was exact and absolute. On July 1, 2015, while standing 7 inches in front of the meter — checking to see whether it was analog or digital — I experienced a thud in my chest that threw me 3 feet backward… at the same time, my cell phone dropped out of my hand as if struck by a lightning bolt. From that moment on, I was unable to use a cellphone, portable phone, or be in Wi-Fi without feeling intolerable neurological symptoms… Migraine-like headaches, severe brain fog, dizziness, and worsening fatigue. While the radiofrequency (RF) meter remained on my house, my symptoms escalated and I began to think my brain was being permanently damaged. I knew I had to get the meter off or escape my home.
5. I immediately called the utility company, told them I had a medical emergency, and insisted that the RF meter be removed instantly and be replaced by an analog meter. They refused. I called and kept calling. How naive I was, thinking they would run over that very afternoon to remove the meter. Instead, for an entire month, the utility company stalled, made up excuses, and even lied — stating they no longer had analog meters available.
6. I reached out to other residents and was told it was against the law to remove a utility meter. This reality meant that I would be forced to endure a radiofrequency (RF) radiation exposure that was injuring me and worsening each day. Apparently, it was against the law to preserve my own life. This was a very different America than the one I grew up in.
7. I packed a bag and prepared to leave my husband and child to drive into the mountains, not knowing if or where I would find safe shelter. Before driving away, I suddenly came to my senses. Was I really going to leave my home and family because of a meter? I knew I had a choice to make. It was either going to be the meter or me. I decided on me.

8. The meter was removed and I found an attorney to represent me on a pro bono basis. She overnighted a compelling hard-copy letter to the entire executive staff of the utility company and the President of their Board of Directors. The letter included evidence and a threat to sue. Two days later, an executive field team showed up at my door, announcing they would replace the radiofrequency (RF) radiation meter with an analog one.
9. When the RF meter came off the side of my house, the headaches, flu-like symptoms, and neurological symptoms disappeared overnight. What remained was an extreme reactivity to all sources of radiofrequency (RF) radiation, a medical condition now known as EMR Syndrome. In other words, as long as I am home or in nature with no sources of RF, I am fine. As soon as I go out into the world, I am ill.
10. EMR Syndrome has completely derailed my life. Despite numerous work opportunities, I'm unable to use a cell phone, computer, or be in Wi-Fi without feeling significant neurological/cognitive symptoms. I dictate all my emails via a landline speakerphone to paid assistants — and I attend Zoom meetings on the only device I tolerate (iPad), but I must stand 5 feet away and cannot interface with the screen at all.
11. Yet I count myself lucky. I have become a fierce advocate for safe technology, using my professional skills to found the OneName Project, the grassroots group SafeTech Westchester, and to lead the EMR Syndrome Alliance, the first organization dedicated to people with electromagnetic injuries. I also continue to work on advancing the musical project that got stalled years ago. I'm grateful to have supportive family and friends and to live in a home with no smart meter, no Wi-Fi, no smart appliances… And a good distance away from the nearest cell tower.
12. I'm grateful to HHS for bringing this topic to light and initiating actions that will further the critical cause of safe technology. U.S. federal agencies must strengthen protections against radiofrequency (RF) radiation and other non-ionizing electromagnetic fields (EMFs). This requires updating exposure limits for cell tower and cell phone radiation, restoring federal research and monitoring, improving device testing, and addressing long-term exposures, with particular attention to children, other vulnerable populations, and wildlife. Additionally, federal exposure limits need to be established for the low-frequency electric and magnetic fields emitted by high-voltage power lines and substations; these are regulatory gaps that federal agencies must address.
13. The body of peer-reviewed science linked to the biological effects of radiofrequency (RF) radiation statistically warrants an overhaul of telecommunications regulations for the protection of Americans. The fact that this hasn't happened yet is indicative of an industry scandal on a par with tobacco — a fact that must be investigated and publicized. Radiofrequency (RF) radiation is also known as man-made electromagnetic radiation (EMR), microwave radiation, and commercially, "wireless" radiation. Natural electromagnetic radiation can be beneficial to humans but radiofrequency (RF) radiation is pulsed and modulated, making it xenobiotic, i.e., harmful to all living things. RF radiation was introduced into our daily lives as a for-profit venture and was never tested on the public for safety. We cannot go backwards to a world without cell phones — but we can move forward with tighter regulations, protective safety guidelines, and best safety practices. Public health and safety are non-negotiable.

14. The following is a mere sampling of the thousands of peer-reviewed studies that link biological health effects to radiofrequency (RF) radiation and electromagnetic fields:

- Increased cancer risk
- Neurological effects
- Genetic damage
- Biochemical changes
- Cognitive effects
- Impacts to sleep

15. As we carve out a safer future, the federal government must 1) prohibit Congress, including special committees, from accepting donations from corporate interests, and 2) the FCC must require employees to sign a non-compete clause, disallowing them to work for the telecommunications industry for a period of years following their tenure at the FCC.
16. **I did not consent, nor do I consent today, to the continuous, involuntary exposure to biologically-active RF/MW radiation.**
17. I endorse the following actions that have been assembled by Safe Technology advocates:

Research and Independent Scientific Review

- Restore independent federal research programs and coordinated interagency review of the scientific evidence. All activities and funding should be publicly reported.
- Direct federal agencies to commission the National Academies of Sciences, Engineering, and Medicine to review the health and environmental effects of non-ionizing electromagnetic fields, including RF and ELF exposures, and issue actionable policy recommendations, research priorities, monitoring, and protection of children, workers, and ecosystems.
- Direct the National Institute of Environmental Health Sciences (NIEHS) to conduct a comprehensive, transparent review of human, animal, and mechanistic evidence on the health effects of RF, ELF and other non-ionizing exposures, including chronic exposure and vulnerable populations. Prioritize evaluations of RF radiation and ELF magnetic fields for inclusion in the National Toxicology Program's Report on Carcinogens.
- Expand research to encompass all artificial non-ionizing frequencies, including powerlines, charging systems, wireless power transfer, LED systems, satellite systems, and mmWave–THz bands associated with emerging technologies.

Risk Assessment and Exposure Limits

- Update RF radiation exposure limits based on a comprehensive review and risk analysis of scientific research to address long-term, cumulative exposures and non-thermal effects, with risk-mitigation protections for children, pregnancy, and medically vulnerable populations. The approach should be a public health approach of risk mitigation.

- Science based safety limits for health need to be developed for all artificial non-ionizing frequencies, including from charging systems, wireless power transfer, LED systems, satellite systems, and mmWave–THz bands associated with emerging technologies.
- Develop wildlife-specific exposure limits and immediate policies to mitigate wildlife exposure and environmental exposures in ecologically sensitive areas.
- Require regular, publicly scheduled reviews of exposure limits and regulations based on current scientific evidence, with public participation, independent scientific review, and timely revisions to address new findings, technologies, and exposure patterns.

Safety Testing and Enforcement

- Require premarket safety testing for health effects from chronic exposure for all new wireless technologies, and for proposed electrical grid infrastructure (such as high voltage 765 kv power lines) emissions, just as is required for drugs.
- Modernize cell phone and wireless device compliance tests to reflect real-world use of people of all ages, including direct body contact and simultaneous exposure from multiple devices.
- Establish routine robust post-market RF radiation compliance testing for all cell phones, RF emitting devices, cell towers, base stations etc., with all results publicly posted and meaningful enforcement.

Exposure Monitoring and Health Surveillance

- Implement a nationwide RF and EMF exposure measuring and monitoring program prioritizing schools, workplaces, residential areas, and sensitive wildlife habitats with 24/7 monitoring.
- All measurements should be publicly posted on an easy to access website with the ability to see measurements over time.
- Analyze data with regular updates for the public.
- Create a national health and environmental surveillance system to document and investigate suspected adverse effects.

Consumer Information and Public Education

- Require clear RF radiation exposure labeling on all cell phones, Wi-Fi, Bluetooth and wireless devices, packaging, and at the point of sale, including applicable separation distances for the test system (if the FCC continues to refuse to update the tests) and practical instructions to reduce exposure.
- Require clear EMF exposure labeling for charging cords, power adapters, appliances, and other electronics, including information on electric and magnetic field emissions and practical instructions to reduce exposure.
- Launch a multimedia public health education campaign for the American public on wireless and cell phone radiation, covering cell phones, Bluetooth devices, laptops, tablets, Wi-Fi routers, and other RF-emitting devices, with clear, practical guidance on

reducing exposure and using wired alternatives. Ensure clear straightforward guidance and the importance of using wired alternatives.
- Expand public education to address electric and magnetic field exposures from charging cords, power adapters, appliances, and other electronics, with clear guidance on reducing exposure through distance, placement, and equipment use.

Risk Mitigation and Exposure Reduction

- Mitigate RF and EMF exposures in schools and childcare settings, prioritize wired connections, and establish protective siting policies to ensure schools are not near RF or EMF emitting infrastructure.
- Prohibit cell towers and high-voltage power lines on or near schools.
- Incentivize technologies and research that eliminate and/or reduce exposure, including readily available Ethernet connections and other wired options.
- Require manufacturers to provide readily usable wired connection options, including plug-and-play Ethernet and cable connections instead of wireless.
- Require manufacturers and network developers to demonstrate that they have researched and integrated EMF reduction strategies into devices and network deployment.
- Consider a federal certification program for no/low EMF technologies and spaces.
- Issue guidance to local governments and institutions on reducing exposures through infrastructure siting, land use planning, building networks, and device selection.

Accessible Public Spaces and Medical Facilities

- Ensure public libraries and other public accommodations provide designated areas free of intentional wireless RF emissions, with wired internet access and measures to minimize other non-ionizing EMF exposures.
- Ensure hospitals, medical offices, and other healthcare facilities provide designated areas and reasonable accommodations for people needing no/low EMF areas while maintaining access to necessary medical equipment and care.
- Establish safeguards and exposure-reduction protocols in patient rooms, waiting areas, maternity units, neonatal units, and other settings serving medically vulnerable populations.

Education and Training for Medical Professionals

- Incorporate education on RF and other non-ionizing EMF exposures into medical, nursing, and allied health curricula.
- Develop independent continuing education on the scientific evidence, research gaps, exposure assessment, and practical exposure-reduction measures.
- Train healthcare professionals to take environmental and occupational exposure histories, including exposures from wireless devices, cell towers, power lines, and workplace equipment.

- Develop clinical guidance for evaluating and supporting patients reporting symptoms associated with EMF exposure, including assessment of other possible causes and appropriate referrals.
- Train healthcare professionals on exposure-reduction counseling for children, pregnant patients, workers, and medically vulnerable populations.
- Provide training on reasonable accommodations and reducing exposures in healthcare settings.
- Establish training on documenting and reporting suspected adverse effects to the national health surveillance system.
- Develop medical education materials and training programs.

Consumer Information and Public Education

- Require all relevant federal agencies to provide clear, publicly accessible information on RF and other non-ionizing EMF exposures, acknowledging that scientific evidence exists reporting associations with adverse health effects, with links to the research and explanations of findings and uncertainties.
- Require the CDC, FDA, and other relevant federal health and environmental agencies to educate the public on practical ways to reduce RF and EMF exposures, including the use of wired alternatives. This should extend beyond cell phones.
- Require the FDA to establish and enforce clear RF and EMF radiation exposure labeling requirements for cell phones and other RF-emitting consumer devices, including information on packaging and at the point of sale, applicable testing separation distances, and practical instructions to reduce exposure.

Workplace Safeguards

- Establish a comprehensive occupational health program for EMF safety
- Characterize and monitor exposure levels in a broad range of exposed occupations, from telecom, plastic industry, utilities, healthcare, military, to retail and education.
- Establish standardized medical surveillance with mandatory recordkeeping and reporting to track worker health and exposure incidents, including overexposures.
- Initiate R&D and innovation programs that prioritize low-EMF design and emission reduction in industrial and workplace technologies, focusing on minimizing unnecessary EMF exposures through improved engineering and manufacturing practices.
- Require machinery and equipment to incorporate engineered EMF controls, shielding, and design features that minimize worker exposure, with verified performance and routine maintenance checks.
- Issue comprehensive, site-specific guidance to minimize EMF exposure and mitigate risk, with special provisions for accommodating pregnant workers, medically vulnerable individuals, and persons with implants.
- Ensure employer/worker training and education.

Restore State and Local Authority

- Congress should restore state and local authority to consider health and environmental effects when deciding where wireless infrastructure may be located, including by amending federal laws that restrict such consideration.
- State and local governments should be empowered to establish protective setbacks for cell towers, high voltage power lines and substations, assess cumulative exposures, protect schools and other sensitive locations, and require meaningful public participation in siting decisions.

Respectfully submitted,
Ruth F. Moss
Westchester County, NY
10.21.2026