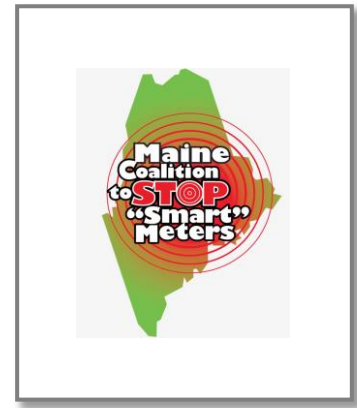


Maine Coalition to Stop Smart Meters

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October 19, 2026

Secretary Robert F. Kennedy Jr
U.S. Health & Human Services
1600 Pennsylvania Ave. NW
Washington D.C. 20500

Re: Department of Health and Human Services - Request for Information on Electromagnetic Fields (EMFs), Radiofrequency (RF) Radiation, and Wireless Radiation Exposure
<https://www.regulations.gov/commenton/HHS-OASH-2026-0397-0001>

Mr. Secretary,

You may not recall but you and I have communicated a number of times prior to your appointment as Secretary since along with being the spokesperson for this Maine coalition I have also chaired the environmental nonprofit Friends of Merrymeeting Bay (FOMB) for many years. FOMB actively engages in research, advocacy, land protection and education and while a lot of our focus is on migratory fish restoration and water quality, we have also been one of the few environmental organizations to educate our members on the toxicity problems of low level radiofrequency radiation (RFR).

Thank you for the opportunity to comment in this proceeding. Maine, in 2010-2011 became the first state with an AMI smart meter roll-out to offer an opt-out option. Most unfortunately we set bad precedent by allowing a fee attached to it. The net result was, as a refined attorney would phrase it, implementation of an order with a coercive effect on those ratepayers against smart meters for a wide variety of reasons. Everyone else called it what it was, extortion, when harm, whether intended or not, is avoided only by paying off the perpetrator. Because the installation of smart meters appeared to have a disproportionate effect on the health of thousands of Mainers, our comments focus on this technology. Our deeper dive into supposed health effects from these meters (Exhibit 9A) found 98% of survey respondents were very sure or fairly sure their new or worsened symptoms correlated to smart meter exposure. Here was an egregious new environmental antagonist, forced on ratepayers, that seemed far more bioactive and immediate in effects, than did exposure to cell phones or other wireless technologies.

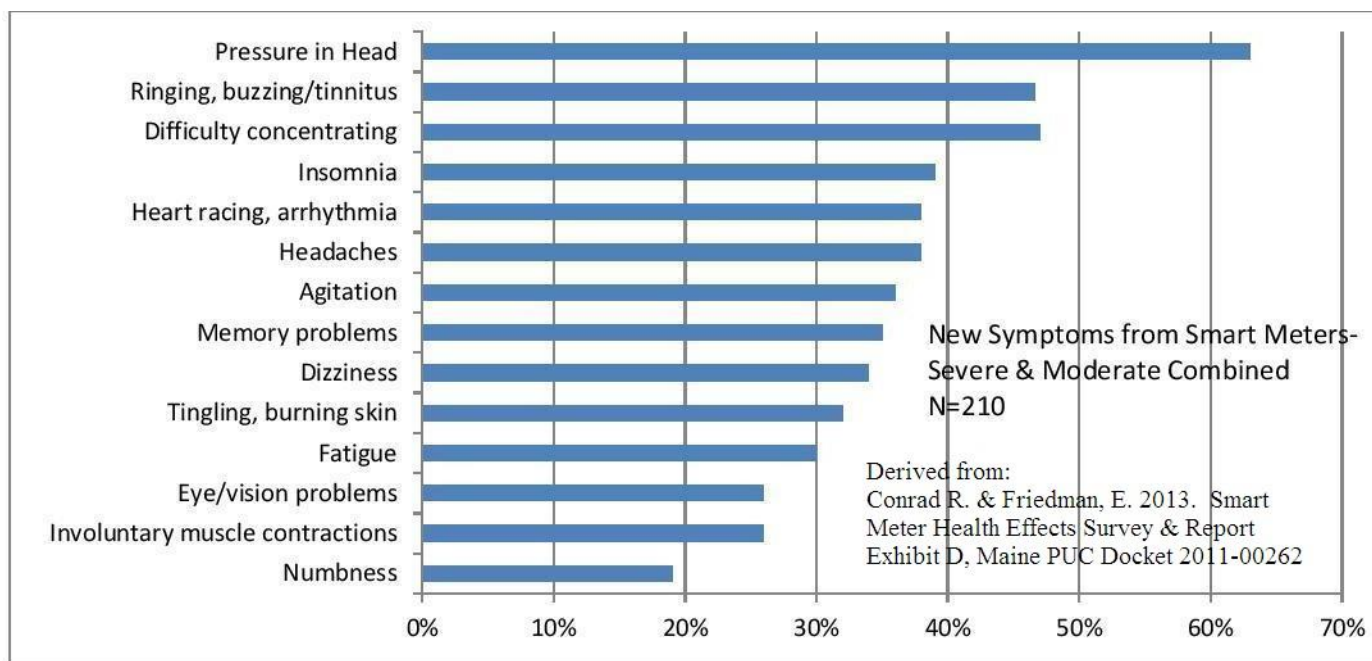
Opt outs are a poor substitute for scuttling these smart meter programs because from the health perspective, if you have electrical sensitivities, unless you live in the boondocks (like I do-and I'm not sensitive), you will likely be influenced by nearby meters even if you opt out. In Maine I personally know people who were forced from their home of 33 years because exposure to a neighbor's smart meter about 30 feet away was too acute. Even when they offered to pay the neighbor's opt out fee, the neighbor declined. Just one of many examples of how these meters can destroy relationships in and outside the home.

Our Coalition took Central Maine Power (CMP) and the Maine PUC to court in 2011 over the smart meter issue. The Maine Supreme Judicial Court remanded our case to the PUC ordering them to conduct their own study on the safety of smart meters rather than rely on decisions from other states. This launched an investigation that went on about 6 years including another appeal by our group, and that is featured in the opening scene of probably the best film on the smart meter issue-Take Back Your Power.

Appearing in our case as expert witnesses were some of the world's top RFR researchers. Rather than reinvent the wheel, for the most part my testimony attached here is a submission of that expert testimony (also submitted in the

initial FCC Docket 13-84 and labeled for that proceeding) along with lay witness testimony from those who have been harmed by RFR exposure. Since that MPUC proceeding, there have of course been further publications addressing the often adverse biological effects of RFR, notably the gold standard National Toxicology Program and Ramazzini Institute studies. I'm sure others will have submitted these along with the also gold standard Levitt, Lai & Manville series of papers dealing with RFR effects on flora and fauna so they are not included here.

Of special note in our MPUC/FCC attachments are Exhibit 5 wherein Jerry Phillips discusses his and other's work on damages to DNA from RFR; Exhibit 7 where William Rea describes his blind challenge testing for EMF sensitivity and Exhibit 9, Richard Conrad's testimony which includes a comprehensive survey of smart meter effects he and I conducted (also included separately as Exhibit 9A). *What stands out in this survey is that 42% of the 210 respondents, without knowledge that their analog meters had been switched to a smart meter, either began suffering RFR symptoms or if already sensitive had their symptoms worsen to moderate or severe following smart meter installation.* For many people, their response time was measured in minutes, hours or a few days. This is not to say that the other 58% of respondents suffered psychological or nocebo effects but only that we could not eliminate these possibilities as these people were aware their old meter had been switched out.



On a personal note, while I consider everyone susceptible to adverse effects from RFR, clearly some are more sensitive than others and at this point, I am not. I do however have an unusual blood cancer, Waldenstrom's macroglobulenemia for which there is no cure and for which after initial chemotherapy in 2014 after diagnosis, I have for many years been on a daily dose of a very expensive targeted therapy BTK inhibitor-a somewhat kinder, gentler poison, with its own side effects. Because many studies have implicated RFR in a wide assortment of cancers and DNA damage, I do not use wireless technology in my home or on my person at all. I am well versed in a broad spectrum of sciences with a B.S. in Environmental Science and years of work in a wide variety of natural sciences.

There are many good reasons to opt out of having a smart meter on one's home including privacy (4th amendment), fire hazard, general health, property takings (5th amendment), surveillance, etc. Unfortunately one needs to pay an opt fee in Maine and many other states to avoid these problems. In my case however, I have a disability (the cancer) that could be exasperated by RFR exposure in my home and I don't have a choice. To stay safe I believe I needed to opt out and asked for reasonable accommodation from CMP in the form of waiving the opt-out fee which they denied.

Initially I filed a housing discrimination complaint against CMP with Regional HUD. The complaint was accepted and routed to HUD's state partner the Maine Human Rights Commission (MHRC) for investigation. In conclusion, the staff attorney investigator recommended reasonable accommodation be granted but was reversed on appeal by

his Commissioners, all of whom came from an industry background. This did however serve as proof of concept for my arguments which had also been used to success by a colleague in OR. On the day of my MRHC decision, HUD shut down acceptance of any further RFR-related housing discrimination complaints. A year or so later I filed disability/discrimination claims against CMP in federal court under the ADA, Fair Housing Act and Rehabilitation Act of 1973. After 5 years, I lost the case, in part because of my oncologist who didn't like lawyers and who refused to educate himself on the basics of RFR and in large part because the case went on so long our original judge who had a very excellent understanding of the issues, retired and was replaced by a magistrate judge with a very different attitude and knowledge base. CMP cut my power off about 5 years ago and I went to great expense to convert my old net-metering solar system into an off-grid system.

One of the oldest concepts in English law is that a “*man’s home is his castle.*” On September 14, 2016, HUD published a final rule in the Federal Register- **Quid Pro Quo and Hostile Environment Harassment and Liability for Discriminatory Housing Practices Under the Fair Housing Act.** As described in the rule, “*One’s home is a place of privacy, security, and refuge (or should be), and harassment that occurs in or around one’s home can be far more intrusive, violative, and threatening than harassment in the more public environment of one’s workplace.*” The Supreme Court has historically recognized that individuals have heightened rights within the home for privacy and freedom from unwelcome speech, among other things. And yet hundreds of thousands of Americans are daily subjected within their homes to involuntary RFR exposure from smart meters (for which there appear uniquely adverse health effects most likely from conducted emissions on building wiring from the meters which are “upstream” of all circuits), added to cumulative exposures from an ever-proliferating environment increasingly saturated with wireless technologies.

Having seen first-hand the devastating effects RFR exposure can quickly have on people’s lives (setting aside for the moment cancers which typically have latency periods of 10-30 years), and having worked on environmental issues for 60 years and toxics for about 40 of those, I can easily say that I consider the proliferation of RFR-emitting wireless technologies, the most significant toxics issue of our time.

Thank you for your consideration,



Ed Friedman, Spokesperson

www.mainecoalitiontostopsmartmeters.org

Exhibits

-  FCC 13-84 Ed Friedman Testimony 8-31-13
-  FCC 13-84 Exhibit 1 Friedman- Hardell
-  FCC 13-84 Exhibit 2 Friedman-De-Kun Li
-  FCC 13-84 Exhibit 3 Friedman-Leszczynski
-  FCC 13-84 Exhibit 4A Friedman-Carpenter
-  FCC 13-84 Exhibit 4B Friedman-Carpenter
-  FCC 13-84 Exhibit 5 Friedman Phillips
-  FCC 13-84 Exhibit 6 Friedman-Morgan
-  FCC 13-84 Exhibit 7 Friedman-Rea
-  FCC 13-84 Exhibit 8 Friedman-Kumar
-  FCC 13-84 Exhibit 9 Friedman-Conrad
-  FCC 13-84 Exhibit 9A Conrad & Friedman 2013 MPUC
-  FCC 13-84 Exhibit 10 Friedman-Hart
-  FCC 13-84 Exhibit 11 Friedman-Lay Witnesses 1&2
-  FCC 13-84 Exhibit 12 Friedman-Lay Witnesses 3-5
-  FCC 13-84 Exhibit 13 Friedman-Lay Witnesses 6-8
-  FCC 13-84 Exhibit 14 Maurer
-  FCC 13-84 Original Exhibit 4 Friedman-Carpenter