



Dear Sir or Madam,

The FCC must halt implementation of 5G wireless while a NEPA review of the environmental and human health impacts and an EIS are completed. The FCC has put the cart before the horse in promulgating rules for 5G without first studying the safety of 5G for humans and the environment. There is consensus within the scientific community that the existing FCC limits for wireless radiation do not protect the population from biological effects ([www.EMFscientist.org](http://www.EMFscientist.org)).

### **FCC must complete a NEPA review and EIS prior to implementing 5G**

The potential environmental and human health hazards from 5G necessitates a comprehensive NEPA review [*Env'tl. Def. Fund v. Tenn. Valley Auth.*, 468 F.2d 1164, 1174 (6th Cir. 1972)] and, specifically, a formal Environmental Impact Statement (EIS). The EIS should include a full review of environmental effects, as well as human health and safety. The FCC has an obligation to evaluate whether “*services or capabilities are essential to public health, safety, or in the public interest*” (H.R. Report No. 104-204, p. 94) and so must protect the public from possible harm caused by radiofrequency radiation.

The FCC is not entitled to essentially disregard comments that do not provide global cost-benefit analysis (*Scenic Hudson v. Federal Power Commission*). The Commission has an affirmative duty to inquire into and consider all relevant facts. The FCC must use government resources to perform the relevant analysis. The FCC should request the EPA use its National Risk Management Research Laboratory resources and experts to conduct all cost analyses necessary.

This proposal also triggers the need for a Memoranda of Understanding (MOU) with U.S. Fish and Wildlife Service under Executive Order 13186 concerning effects on migratory birds.

### **U.S. Department of Interior States: Current Radiation Standards Inapplicable**

On February 7, 2014, the U.S. Department of Interior (DOI) stated, “*the electromagnetic radiation standards used by the Federal Communications Commission (FCC) continue to be based on thermal heating, a criterion now nearly 30 years out of date and inapplicable today,*” in reference to the current limits governing radiation utilized by WiFi. The DOI letter discusses a number of studies in which birds appear harmed by low-level RF radiation associated with cell towers and other wireless technologies ([http://www.ntia.doc.gov/files/ntia/us\\_doi\\_comments.pdf](http://www.ntia.doc.gov/files/ntia/us_doi_comments.pdf)). **Furthermore, DOI required FirstNet to undergo a comprehensive NEPA review and planning program. Implementation of 5G, which will have similar widespread impacts, requires a NEPA review as well.**

The National Toxicology Program recently released results showing that radiofrequency radiation (RFR) can indeed both break DNA and cause cancer. A replicated European study has found that RFR is also a cancer promoter (<http://ehtrust.org/science/facts-national-toxicology-program-cellphone-rat-cancer-study/>). Furthermore, the literature on RFR in the very high frequency bands required for 5G document DNA breakages, serious cellular resonance effects, and other detrimental metabolic effects ([http://www.bioinitiative.org/report/wp-content/uploads/pdfs/sec15\\_2012\\_Evidence\\_Disruption\\_Modulation.pdf](http://www.bioinitiative.org/report/wp-content/uploads/pdfs/sec15_2012_Evidence_Disruption_Modulation.pdf) and [http://www.stopglobalwifi/documents/2001\\_kositsky\\_et\\_al.\\_ussr\\_review.pdf](http://www.stopglobalwifi/documents/2001_kositsky_et_al._ussr_review.pdf)).

Non-industry funded studies have consistently found links between RFR and various negative biological effects ([www.bioinitiative.org](http://www.bioinitiative.org)). They include serious neurological, cardiac, and metabolic effects, as well as DNA breakage which can lead to cancer and genetic defects (<http://www.mainecoalitiontostopsmartmeters.org/?p=1469>).

My family has already experienced harm from the rapidly rising ambient levels of RFR. The rising ambient RFR levels, due to the recent wireless insanity, are already causing my family to experience symptoms of Radiofrequency Sickness. My sons get cardiac arrhythmias. My wife is functionally impaired by RFR in multiple ways. I experience high blood sugar and increased insulin resistance when I am exposed to RFR, in addition to other symptoms.

The rapidly increasing RFR levels is impacting our ability to earn a living. I used to vend at farmers markets in Madison, Wisconsin and I am no longer able to do so due to the rising ambient RFR levels causing serious neurological symptoms suggestive of incipient ALS. The symptoms disappeared at the end of market season when I was able to spend time at my shielded home in much lower ambient RFR levels. (The levels outside our home are hundreds to thousands of times lower than ambient Madison levels. Even so, I can tell the improvement in my health when I am inside my shielded home where the levels are a third to a tenth the ambient outside levels and peaks are reduced by over half.) ALS is a progressive fatal neurological disorder whose incidence is increasing ([https://www.cdc.gov/als/Download/Neuro%20Clin\\_ALS\\_Risk\\_Factors\\_2015.pdf](https://www.cdc.gov/als/Download/Neuro%20Clin_ALS_Risk_Factors_2015.pdf)). ALS is being linked to factors including oxidative damage (positively linked to smoking which causes oxidative damage), EMF exposure, and military service which would entail high levels of RFR exposure. RFR has been shown to cause oxidative damage (<http://www.ncbi.nlm.nih.gov/pubmed/26151230>). If my experience is any indicator, the FCC is directly responsible for those deaths by promoting a dangerous technology in complete disregard of the science and the scientists who are calling for biologically-based population-protective RFR safety limits. This willful disregard of the consequences is a violation of our human rights and the Nuremberg Code of Ethics, please read "Wireless Technology Violates Human Rights," attached and at <http://www.electricalpollution.com/documents/WirelessViolatesHumanRights2016.pdf>.

Studies, including the National Toxicology Program studies, have shown wireless to be a dangerous technology and 5G, according to Chairman Wheeler's own comments, is an infrastructure intensive technology. So, invest in safe, wired infrastructure instead of spending a lot of money to saturate entire communities with hazardous radiation. The "cool" factor is not worth the peril.

Take the time to do due diligence and protect all our safety by conducting a comprehensive NEPA review and EIS. Protect your family, friends, and the country - implement a wired broadband internet program instead. Be on the right side of history.

Sincerely,

Dan Kleiber