

In the Matter of )  
Updating the Commission's Rule for ) WT Docket No. 19-71  
Over-the-Air Reception Devices (OTARD) )

1. My name is Dafna Tachover. I am the Director of the Children's Health Defense ("CHD") 5G and Wireless Harm Project.
2. CHD submitted a written *ex parte* in this proceeding on April 17, 2020. Page 7 of that filing indicated that "Children's Health Defense is collecting statements by additional people who expressly object to intrusions on their property, consider non-consensual irradiation to be a battery on them and their family and a form of child endangerment. Many of those have Microwave Sickness and will demand that they not be exposed to emissions that will make them even sicker. Those statements will be provided in a subsequent filing." **CHD is now providing the promised collection of statements of "objecting persons" and it includes 15,090 such persons, including, 6,231 people who they and/or their children have been injured by wireless based technology and radiation in levels the FCC considers safe for the public.**
3. The following discussion explains how CHD collected the names and other relevant information of those who provided their "non-consent" ("objecting persons") and (i) indicated that intrusions will be considered a nuisance, (ii) will consider non-consensual irradiation to be a battery on them or their children, or (iii) will consider the non-consensual exposure to be both a nuisance and a battery. I will then discuss how the attached report was generated and prepared, and the measures that were taken to ensure the individual responses were from real (non-fictional) people that registering genuine, non-frivolous objections to exposure.
4. CHD used the "Salsa" platform (SalsaLabs.com) for this effort. Salsa is a technology company that provides management and "take action" software to nonprofit organizations. It has over 10,000 non-profit organizations as clients. For the purpose of collecting objecting person registrations supporting our *ex parte* submission, CHD used the Salsa's Petition platform through our website.
5. We created a page on our website dedicated to this effort and launched it on April 17<sup>th</sup>, 2020. The web page included a link to CHD's *ex parte* for their review. If the person was interested in joining the effort and declaring their objection, they were allowed to fill out a form-based Declaration of Non-consent. The form called for a series of field entries, including but not limited to first name, last name, email address, and postal address (including city, state and zip code). The respondents were then asked to indicate whether they do not consent to be exposed to this radiation in their home based on general grounds and/or by reason of being injured from Wireless Radiation. They had to answer "yes" or "no" to each of the following two statements: Statement one: "I am objecting OTARD on General Grounds." Statement two: "I'm objecting to OTARD as I and/or my child got injured by wireless." Choosing "yes" or "no" to each of these statements was mandatory.



6. The content of the page dedicated to this effort on our website and an image of the form they had to fill-out are attached as Tachover Exhibit 1.
7. On May 11, 2020, we closed enrollment for purposes of inclusion of our supplement. For that reason, we had to remove the enrollment form from the webpage. We added text to explain that the campaign is now closed to enrollment.
8. The rest of the information is still available on our website and has not changed since April 19<sup>th</sup>, 2020. It should be noted that on April 19<sup>th</sup> (two days after we initially launched the campaign), we made some content change as a result of consistent feedback we received expressing that the way the information was presented (specifically with regard to the reasons for objections), was confusing. We reviewed the page and discovered that human error led to unintentional omission of a paragraph we had sent to our webmaster for inclusion. Therefore, on April 19<sup>th</sup> we added the information that was missing to the content and made additional minor language edits to the post. We also changed the default answer to the above-mentioned statements from “no” to “yes”. We time-stamped and logged these corrections so we could determine which submissions occurred before the change and those made after the change. I do not believe the content changes were substantively material or affected participation or results in any significant way. All persons were clearly intending to join CHD’s *ex parte* submission and register an objection to exposure they deem non-consensual; at worst it may have slightly impacted their specific choices on whether to register an objection on one ground (nuisance only or battery only) or both grounds.
9. The objecting persons also had an option to include a comment in their own words. The comments supplied by individuals are also provided within the attached report (Tachover Exhibit 2) and are considered an integral part of the submission. The inclusion of an individual comment even more assurance that the objecting person is a real human being that is expressing a genuinely held objection to non-consensual exposure. About 2,500 people added a comment with their enrollment.
10. The list of objecting persons on Tachover Exhibit 2 includes each person’s name, the state in which they reside, the grounds on which they do not consent to be irradiated in their home, and their personal comment if they made one. To protect their privacy, we did not include their full address and their email address in the report (Tachover Exhibit 2). We have retained that information and the dataset will be made available to the Commission on a confidential basis upon request.
11. During the time in which the enrollment was open, we made two changes to the list of objecting persons. We were contacted by one person on April 20<sup>th</sup>, 2020, who explained he did not want his name to appear on the publicly disclosed list. I asked our tech person to remove that man’s entry on April 24<sup>th</sup>, 2020. On April 25<sup>th</sup>, 2020 I asked our tech person to remove the name of a woman following her similar request that day.

### **Generating the Final List**

12. On May 11th, 2020, we closed the enrollment by removing the registration form from the page. The form was removed by CHD’s tech support expert who is responsible for maintaining our website, including operating the Salsa platform.
13. Immediately after the registration form was removed, I asked our tech person to generate the final list of objecting persons. This person immediately exported the data from the Salsa



platform as a CSV document, imported the file into an Excel spreadsheet and emailed it to me on the same day.

### **The Integrity of the List of objecting persons**

14. On May 11<sup>th</sup>, 2020, I forwarded the list to a member of our organization to review the data to ensure the integrity of the list of names and to prepare the list for submission.
15. We are aware that information collected online is sometimes subject to bot attacks or prank (and often repeated) entries using fictitious names. We took reasonable measures to ensure the integrity of our list of objecting persons.
16. The way we collected the data, the use of several required entries into multiple mandatory fields and the additional measures we took to ensure the integrity of the list of objecting persons, significantly reduce the possibility that the objecting persons are bots or fictitious rather than real people expressing genuine concerns.
17. The Salsa software we used has internal protections to provide technical protection from bots. We contacted the company by email and asked what protections their system provides. The company responded that Salsa uses both passive and active mitigation methods to protect its clients from spam bot attacks and card testing initiatives. They wrote us that "Though not an exact science, we leverage internal tools based on behavior we see and 3<sup>rd</sup> party artificial intelligence measures to ensure our clients are not negatively impacted by such actions. The systems team takes an iterative approach around this (it has to be this way because bots are constantly attempting new ways to bypass the systems they've implemented)."
18. We also took additional measures to ensure the integrity of the list of objecting persons. The objecting persons had many fields to fill out and we made the fields mandatory which makes it more difficult for bot systems.
19. In addition, we assigned a highly reliable member of our organization, whom I have known for years and has often assisted me with detailed oriented work to review each entry and ensure its integrity. I provided specific instructions to that person:
  - A. Manually check each submission;
  - B. Make sure each of the fields was filled in and remove anyone who didn't fill out all the fields;
  - C. Remove anyone from the list who did not provide their full first and/or last name.
  - D. Remove any submission that included the word "anonymous" in one of the name fields, and any name that appeared suspicious.
20. In fact, almost all those who submitted filled out all the fields. This is an indication that it is unlikely that the list was penetrated by bots. None of the entries included "weird" names.
21. There were entries that included entered "anonymous" in the first and/or last name. We believe most of those that did were likely unaware that we would not be able to include "anonymous" entries in our report to the FCC.

### **Analysis of the Data and Comments**

22. Following is a summary of the data presented in the report (Tachover Exhibit 2): Our list includes 15,090 objecting persons. Of those, 6,145 object to the OTARD extension on general grounds and because they and/or their child have been injured by wireless radiation. 6,231 object



to the OTARD expansion because they and/or their child have already been injured by wireless radiation. 8354 object to the OTARD rule extension on general grounds. There were also 517 who submitted the form for registering an objection but did not affirmatively invoke either of the two available express reasons for objection. They may have had other reasons or they erred in their attempted entry. Either way it is clear they object for some reason.

23. As noted, there was a space for people to submit comments using their own words. Many of about 2,500 comments were particularly insightful or poignant, I will quote from just a few:

“As a researcher and Neuroscientist, I know that radio frequencies and magnetic fields can affect human health. The fact that 5G has not been tested and is being fast-tracked for deployment is an attack on all US citizens.”

“My beautiful and beloved daughter died in 2011 at the age of 40 from the incurable brain cancer found to be caused by cell phone radiation by the US National Toxicology 10 year study of the effects of cell phone radiation.”

“My work documented that the ‘mystery illness’ in U.S. diplomats to Cuba and China is, to a virtual certainty, due to pulsed radiofrequency radiation. This is now acknowledged as the leading hypothesis by the National Academy of Sciences.”

“My son has had trouble sleeping and plagued by frequent headaches since the installation of 5G towers across the road and down the street from our home. I cannot bear to have any of these towers closer to our property, my son will become even sicker!”

“Was hit with a bomb in Iraq bomb squad Marines 2006. Pretty wild to see military trucks with 5-G operating systems deployed in Iraq during battle and on US soil in Downtown Los Angeles during the Wall Street stand down of 2010.”

“Myself and my children may have not been injured by wireless that we know of, but I’m not looking to find out what kind of damage 5G will do to us. There are studies suggesting 5G is harmful. We deserve to be safe in our homes.”

“I was injured by wireless radiation. I now experience severe symptoms of radiation sickness, I’ve been doing my best to heal in the past year, this is a very difficult sickness to live with and extremely expensive to remediate your home. Please stop.”

“I have children with Autism, we have had to implement a lot of safety precautions regarding emfs in our home. Since we have our children are finally sleeping through the night and my non-verbal child has begun speaking. “

“I’m already feeling the ill effects of the 5G box that was just installed on a pole on my property.”

“Stop putting profit before public health!”

“My daughter is 100% disabled because of radio frequency radiation and it is life threatening. My daughter can not go anywhere because of the smart meters. With 5G she will not survive.”

“My nervous system is already sensitive to EMF! I am living with constant tinnitus, headaches, palpitation, anxiety...I cannot be subjected to any more!”

“My wife is 100% disabled from radio frequency radiation. It is life threatening for my wife she will die.”

“I am ashamed to be an American! The government quit working for the people decades ago! ... We have a debt we can never pay. Agencies that promote, the things they are supposed to protect us from. IT'S TIME TO WAKE UP!!!”

### **Conclusion**

24. Our solicitation for participation and objection statements generated a very large and emphatic response. Although the results do not provide enough data to draw statistical inferences about the population at large, it is clear many people are very concerned about exposure and will object or withhold consent when given the opportunity and that there are many who already have been injured by wireless technology and even by 5G. The Commission must expressly deal with the issue of how to accommodate those who object to or simply do not consent to exposure, and this is especially so for those who report already being injured by this technology. The Commission must also expressly address the problem of emissions that intrude on private property when the property owner has not consented to the intrusion. Any final order adopting rules that does not satisfactorily address these issues will leave important issues unresolved and suffer for lack of reasoned decision-making.

This concludes my Declaration. I swear and affirm under penalty of perjury that the foregoing information is true and correct to the best of my knowledge and belief.

  
Dafna Tachover

Dated: 5/18/2020