

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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

Comments of Nina Beety

I oppose these proposed rules.

These rules would strip states, cities and counties of regulatory authority, commandeering the land and people under their jurisdiction, and violate the 10<sup>th</sup> Amendment.

These rules would deny the public their due process including adherence to local rules, public notification and public hearings, data on installations and equipment, and discretionary permitting.

These rules would deny people their privacy and property rights. These nuisances would be exempt from regulations.

Since there would be no permitting, these installations would be literally invisible to local governments, with no information available to nearby residents, including on where they are located.

There would be no monitoring and no policing of these installations, their numbers, or their emissions.

Neighbor would be pitted against neighbor. Companies would offer attractive leasing fees for placement, with no regard for the adjoining neighbors by anyone.

The Federal Communications Commission ignores substantial costs to Americans from "deployment of 5G wireless networks and other advanced wireless technologies," and "development of advanced applications like the Internet of Things, smart cities, and telehealth."

The commission has rushed ahead and not exercised due diligence and caution. The public is still waiting for action on the RF standards proceeding which the commission put in limbo for six years and counting.

In previous proceedings, the commission has heard ample testimony from Americans

impacted by FCC policy and wireless radiation exposure. Americans disabled by electromagnetic sensitivities have told the commission of the serious disabling health effects they are experiencing now with current exposure levels. The commission was urged by the cities of Boston and Philadelphia in 2013 to address the ADA and the “serious medical problem” of electromagnetic sensitivity

“The dockets here have been updated with massive additional evidence of the crippling effects of RF radiation on an admitted minority – but a suffering minority – of U.S. citizens “<sup>1</sup>

But the commission has remained silent and continued with its plans.

This proceeding has the appearance of a facial challenge of the ADA.

By “facilitating” and “supporting” deployment of infrastructure, the commission has even ignored IEEE guideline limitations:

“...These exposure limits are intended to apply generally to persons permitted in restricted environments and to the general public in unrestricted environments. These exposure limits are not intended to apply to the exposure of patients by or under the direction of physicians and medical professionals, as well as exposure of informed volunteers in medical or scientific research studies and might not be protective with respect to the use of medical devices or implants.”<sup>2</sup>

These microwave facilities will be even closer to people – to their homes, schools, places of work, medical care facilities, essential services – with far greater impact.

I strongly urge you to reject these proposed rules.

/s/ Nina Beety

Member, California EMF Safety Coalition

June 3, 2019

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<sup>1</sup> Reply Comments of Cities of Boston and Philadelphia, ET Docket No. 13-84, 03-137, November 18, 2013

<sup>2</sup> [https://standards.ieee.org/standard/C95\\_1-2019.html#Additional](https://standards.ieee.org/standard/C95_1-2019.html#Additional)  
IEEE C95.1-2019 - IEEE Approved Draft Standard for Safety Levels with Respect to Human Exposure to Electric, Magnetic and Electromagnetic Fields, 0 Hz to 300 GHz