



June 17, 2019

To: Federal Communications Commission

Re: Comments in opposition to FCC Docket No. 19-71

These proposed FCC rules to modernize OTARD rules by incorporating by reference “hub or relay antenna” by amending Section 1.4000(a)(1)(i)(A) and Section 1.4000(a)(1)(ii)(A). This means that 5G hubs and antennas can be installed as a matter of right wherever direct broadcast and antennas used for video programming services are located.

If these new rules are adopted, a 5G network antenna located on private property would be exempt from local and state regulation (subject to size restrictions). This would include network systems for utility companies, broadband, wireless companies, and satellite, including SpaceX, OneWeb, etc. The facilities would be exempt from local government permitting, public notice, public hearings, RF reports, discretionary permits, design guidelines, and all land use regulations, and they could be installed anywhere.

Unregulated and unpermitted co-location of multiple antennas on private property would also be possible. Antennas would suddenly appear. Because they would be exempt, cities and counties would generally have no information about them – company name, specs, output, equipment, etc.

Property owners would be offered monthly income or free services to host these microwave facilities on their properties. Neighbor would be pitted against neighbor, as people sign lease agreements without regard for their neighbors. This would be open season.

This commandeering proposal by the FCC would prohibit state and local governments from regulating land use within their jurisdictions when it comes to 5th Generation Wireless hubs and antennas. Forced antenna installations that results increased antenna densification on private properties will create increased chronic exposure conditions to electromagnetic radiation, classified by the World Health Organization as a Class 2B human carcinogen.

FCC is urging an accelerated deployment schedule for the 5th generation wireless infrastructure throughout the United States. This is being done without a public health review of the growing body of scientific evidence that reports increased rates of reproductive problems, neurological

diseases and cancers known to be related to exposure to electromagnetic radiation from wireless sources.

At the urging of the U.S. Congress and the FCC, private companies are installing a national 5th generation wireless infrastructure and will not be subjected to regulatory monitoring or enforcement to assure public health protection. Further, these proposed rulemakings further preempt states ability to protect the population from harmful exposure conditions due to the federal health preemption in place since 1996.

Who will protect the public? Who would people turn to should they be harmed?

The International EMF Scientist Appeal is currently signed by 248 scientists in 42 nations, all of whom have published EMF papers in peer reviewed scientific journals, reporting biological or health effects from human-made sources of non-ionizing radiation on humankind and nature. These reported findings support the expert opinions of these EMF scientists that the current exposure guidelines set by the FCC, by international organizations and by many nations are not protective enough.

Initiated in May, 2015, this Appeal continues to urgently call upon the United Nations, its sub-agencies, the World Health Organization, the United Nations Environment Programme and all UN member nations to investigate and address what many experts now define as a growing global health crisis. The Appeal emphasizes the serious health risks posed to children and pregnant women and calls for greater health protection for all, including the most vulnerable, including people who are electrically sensitive, are older, or, are ill.

The Advisors to the International EMF Scientist Appeal stated in 2017, “in keeping with the U.N. Guiding Principles on Business and Human Rights, to “Protect, Respect and Remedy”, 5G technologies must be subjected to an independent health and safety assessment before they are launched.”

The FCC needs to urgently consider the potential impact on the health and safety of the U.S. population before continuing to support the deployment of 5th generation wireless technologies.

For further information, we refer you to the Appeal, located at www.emfscientist.org.

Regards,

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Director
EMFScientist.org

On behalf of Magda Havas, Henry Lai, Ronald Melnick, Joel Moskowitz and Annie Sasco,
Advisors to the International EMF Scientist Appeal