



Alliance of Nurses for Healthy Environments
Bringing Science and Passion to the Environmental Health Movement

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VIA ELECTRONIC FILING: June 17, 2020

Ms. Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th Str. SW
Washington, DC 20554

RE: [FCC Docket #19-226](#), "Targeted Changes to the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields."

Ms. Dortch,

The Alliance of Nurses for Healthy Environments is made up of nurses from all over the US working in the areas of public health, environmental health, clinical practice, research and academics. As medical and public health professionals, we are writing to express our opposition to the above captioned rule. We believe the Commission has failed adequately consider the established and newly emerging science on RF microwave radiation and its impact on human health.

Wireless companies are densifying wireless antennas in every neighborhood and building. We are exposed to exponentially more Radio Frequency Radiation RFR every day. The FCC must inform and protect Americans from any potential health risks associated with exposure to RF microwave radiation. determination of risk can must be evaluated from properly conducted, *independent* studies. You must not allow the public to be part of a long-term experiment to see if human exposures are safe that is your purpose. Documented adverse health effects that can occur at the FCC's current radio frequency exposure limits. The International Classification of Diseases has given an "ICD 10" code to symptoms of adverse health effects. We have no way of *knowing what adverse effects will occur at the expanded range of frequencies* suggested in the proposed rule. There is extensive and expanding peer reviewed US and International scientific literature currently available on the effects of RFR and it appears the Commission has ignored that literature. It is the FCC's responsibility to ensure the "safety of life" for all Americans as set forth in the Communications Act of 1934.

Comments on specific issues raised in the proposed rule follow.

Paragraphs 125 and 126 – An absence of scientific studies does not mean an absence of harm. There and there are **no** human or animal studies yet on the much higher frequencies proposed in this docket. The Commission is proposing to push through plans for the next generation of wireless despite the fact that scientists are still studying and documenting evidence of cancer and other biological harms from 2G, 3G and 4G exposures. The Commission has asserted that "it is unaware of adverse non-thermal effects" yet the FCC cannot document any investigation of the issue or engagement with highly regarded scientists studying the short and long-term biological impacts to the human population



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especially children whose bodies are still developing and who are growing up in “wireless smog” due to the densification of wireless technology though out the country. Is the FCC engaged in a conscious effort to disregard science to facilitate the rapid deployment of new technologies to benefit industry at the risk of our health and well-being? Asserting that there is no harm is misleading at best.

Paragraphs 131-135 - There is no scientific basis for the claim that periodic, high-level exposures are not harmful. Humans do not experience periodic high-level exposures on an “*average*.” Allowing measurements of Radio Frequency (RF) microwave exposures to be “averaged” **does not protect the public**, it only serves to facilitate compliance with FCC limits by manufacturers of wireless devices/antennas/products.

We **oppose** the proposed change allowing manufacturers to produce wireless devices that *govern their own radiation power output by averaging radiated power*.

The current COVID 19 pandemic has increased the use of notebooks and tablets by children who, according to the International Agency for Research on Cancer (IARC), are more vulnerable to RF radiation than adults. The FCC uses outdated Specific Absorption Rate (SAR) and power density testing protocols based on adults. The FCC should use appropriate models that include children and adolescents. We suggest that these regulations have realistic (not averaged) protections especially for pregnant women, children of all ages and young adults.

Paragraphs 141-143 – Wireless Power Transfer (WTP) devices operating at ranges in excess of 50cm, must undergo pre-market testing that proves the safety of these devices. It must first require manufacturers to conduct pre-market testing to demonstrate the safety of such devices in all possible “worst case” scenarios. Unanticipated damage and potential collateral damage must be studied including non-thermal biologic impacts with mitigation techniques that can limit or eliminate damage to the public should be part of testing.

The commission has a very important responsibility to protect the health and safety of the public. Your considerations must put safety before the interests of the telecom industry. Your charge is a daunting one and the industry may want to rush forward. You must resist this pressure lest you make mistakes that will cause damage and death. In the middle of the last century leaded paint was widely used because it dried faster. Europe banned leaded paint in 1926, but the US embraced it. The result was hundreds of thousands of children exposed to lead leading to developmental disabilities. Still today, nearly 70 years later children are being exposed and millions of dollars are being spent on remediation. Proceed with caution and put public health first.

We strongly urge the Commissioners to rigorously re-evaluate and reconsider the FCC RF exposure standards and measurement protocols proposed in this docket with full consideration of potential adverse health effects for our children, for the general public, and for occupational exposures.

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