

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 )

Reply Comments of Nina Beety

As a regulatory agency, the Federal Communications Commission has the primary responsibility to the American people to evaluate and regulate. It is not tasked with uncritical adoption and promotion of any technology. "Flying blind" is how Senator Richard Blumenthal described the unevaluated rush to 5G. The FCC is ignoring evidence that does not support wireless deployment, including the many costs of this program.

In this proposed rulemaking, the FCC specified it wants comments that support deployment.

"Commenters opposing the proposal should explain their reasons for doing so, including providing any relevant data, and should discuss other steps the Commission could take to facilitate the deployment of the infrastructure necessary for modern fixed wireless networks."

That is the opposite of the due diligence required of a regulatory commission. In dockets, spectrum auctions, and speeches, the FCC language is virtually indistinguishable from the public relations pitches and TV ads of technology companies and wireless providers. In view of the very severe program costs, the FCC's actions and failure to regulate are reckless.

Page 16 of the FCC proposed rulemaking says:  
"F. Federal Rules that May Duplicate, Overlap, or Conflict with the Proposed Rules  
23. None."

The U.S. Constitution has strict delineations between federal and state jurisdiction, and so did the 1996 TCA. Under what authority does the FCC tell states and their political subdivisions what they can and cannot do regarding land use regulation?

This seems to meet the definition of commandeering.

The FCC has received substantial testimony and scientific research for many years on the health and environmental impacts from radiofrequency electromagnetic radiation. Under what authority does the FCC ignore this evidence and public health and environmental impacts from 5G and wireless technology and require universal and mandatory exposure for everyone without their full informed consent?

The EPA, Department of the Interior and NIH National Toxicology Program have exposed weaknesses and fallacies in FCC guidelines. The Interagency RF Working Group raised significant questions on guidelines, questions that I have been unable to find were ever answered. Instead, industry guidelines were adopted as governmental rules despite the conflict of interest. Where is the FCC's authority to ignore the input of other federal agencies and federal experts on negative health and environmental impacts?

Persons disabled by electromagnetic sensitivity and experts have provided testimony and documentation for years to the Commission. Under what authority does the FCC ignore ADA and state-equivalent rules on disabled rights, access, and freedom from discrimination?

This rulemaking and previous approvals of terrestrial and sky/space-based projects dictate universal, mandatory exposure. Boston and Philadelphia told the Commission in 2013 that this serious medical problem must be addressed.<sup>i</sup> However, the FCC has continued its policy of silence and refused to discuss the severe and costly impacts to people disabled by electromagnetic sensitivity, people with medical implants susceptible to interference, and people with health problems that can be exacerbated by these EMF-emissions.

The only U.S. prevalence data was gathered in California in 1998, and only for electromagnetic sensitivity, and the frightening percentage of EMS at that time, under much lower exposure levels than today, was 3.2%. How many people in the United States in all groups will be severely affected by the EMF emissions of what you are deploying?

How many people do not connect their disabling health problems with wireless exposure because of the media silence and governmental inaction? Is it a "suffering minority" of 20%? 30%? Or is it more now? How many millions of Americans are suffering at your hand?

Boston and Philadelphia's reply comments in 2013 were ignored by the Commission. Though these prestigious cities were birthplaces of the United States, they are disregarded because they are critical of FCC policy.

I am disabled by electromagnetic sensitivity. This and past FCC initiatives violate my civil rights. Under what legal authority do you presume to tell me what is best for me and other Americans?

Under what legal authority do you propose to increase my exposure to EMF emissions by deploying these devices around me, without my consent and over my explicit refusal, as well as doing that across the nation?

Who would be liable for injuries or damage arising from these private property installations? Would it be the property owner? The companies? No one?

What would be the requirement for insurance?

Who would track where all these devices are located?

Who would verify compliance with FCC guidelines? Or would it be the same lack of policing as happens with cell towers in general – in other words, an unregulated free-for-all?

I'm told that under OSHA rules, workers have to have advance warning and notification of potentially hazardous conditions with a readily available telephone number to call so that power to the antenna or device can be turned off before they work. What signage would be required to be installed at every premise where these are installed? The lettering would have to be large enough for people to see at a distance and not get exposed.

### Costs

"We need to know the true costs of 5G before we can assess its potential benefit."<sup>iii</sup> Where is this analysis?

The Federal Communication Commission has been gambling away the entire economy and the American future by its decisions and its refusal to evaluate the costs of its proposals, including this OTARD initiative. That is madness. Many of these costs are known, but the sole focus is on "benefit". Yet, the myriad serious harms are escalating and becoming more visible, and that includes economic costs.

Severe economic impacts and vulnerabilities created by FCC policies and programs include

- Jobs in the wireless and telecom industry promoted by the FCC; all those jobs are vulnerable
- Stock market stability now dependent on telecom and wireless tech stability
- Dependency on wireless tech within the economy and culture
- Elimination of existing, publicly funded and safer alternatives through forced retirement
- Unsustainable energy demand by technology
- Unsustainable water demand by technology
- Toxics pollution by manufacturing
- Unsustainable production and raw materials needs

Perversely, the industry has proudly called this "disruptive technology", and it is. Socialization and normalization campaigns in the media have promoted technology immersion. This new culturization has disrupted the entire fabric of American society and functioning, and is destroying American life and well-being.

Sociological and political costs through shifts in behavior and societal structure.

- Normalized 24/7 technology connection and inactive tech-intensive life
- Normalized separation from nature, play, outdoors, interaction (eg. steady Comcast ads of families or children alone immersed in tech devices indoors during the day, ignoring the sun streaming through the windows). Turning a deaf ear to nature and others, people walk with ear buds, needing their soundtrack constantly playing.
- Normalized dysfunctional behavior and technology addiction starting at birth, head down, plugged in and tuned out.
- Contribution to birth and fertility rates dropping through:
  - Fertility impacts and birth defects from microwave and EMF exposure,

- Tech addiction, disconnecting from healthy relationships
- Easy access to pornography which can result in pornography addiction, particularly in young men, disrupting their ability to engage in healthy relationships
- Less interest having children
- Socialization and normalization leading to poor communication patterns, breakdown in family systems, parental modeling of addiction and neglect, unhealthy relationship or inability to have relationships
- Decreasing role models.
- Changing buying patterns
- Declining work ethic
- Declining small business formation
- Declining home purchases
- Declining academic and cognitive abilities and performance
- Declining physical, emotional, and intellectual fitness
- Declining adaptability to life stresses and challenges.

Economic impacts on increasing disabled people:

- Damage to families and marriages
- Loss of economic drivers and engines due to disability and being forced from homes

Health

- Rising health impacts – heart, infertility, birth defects, cancer, strokes, neurological disease and death
- Rising impacts on social and medical system that is already over-stretched

With the neurological damage and disease, will society become a massive bedlam with warden/caregivers dispensing food in warehouse facilities? Or will the numbers and costs be so extreme, that the neurologically disabled and dementia patients will simply be abandoned on the streets or euthanized?

Job loss due to the Internet of Things and autonomous vehicles: Job loss due to automation and technology has been occurring for years. This is predicted to rise steeply as AI ramps up. In the transportation sector alone, train, bus, truck, taxi, and other transport workers will no longer be necessary.

- Impacts to social welfare agencies and funds, unemployment, and the social safety net, Increased foreclosures,
- Increased homelessness
- Increasing mental illness especially to children and young people
- Educational costs for specialized personnel and behavioral control
- Increased suicide
- Increased environmental damage, including loss of bees, birds, butterflies, bats, and other pollinators, and tree damage and deaths

The FCC has harmed society in deep and far-reaching ways. Wireless technology is having a

profoundly destructive impact on the economy..

There will be billions, even trillions of dollars in human costs and losses.  
There will be trillions of dollars in environmental costs and losses including due to bee deaths.

Wireless technology is an economic house of cards. Failure will happen.

Yet, the only question the FCC is willing to entertain or is interested in asking is: how can deployment be facilitated.

The Commission is driving the economy and the well-being of America off a cliff.

Who authorized you to act in this heedless, wanton fashion? Certainly, the American people did not.

/s/ Nina Beety

Member, California EMF Safety Coalition

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<sup>i</sup> <https://ecfsapi.fcc.gov/file/7520958706.pdf>  
Boston, Philadelphia, BBK comments to FCC, 11-18-13

<sup>ii</sup> 5/30/19,, Ontario 5G press briefing  
<http://c4st.org/ontario-doctors-warn-of-rising-health-care-costs-after-5g-roll-out/>  
<https://youtu.be/pxXgGauTdy0>