

ET 13-84



Federal Communications Commission
Washington, D.C. 20554

February 4, 2015

Federal Communications
Commission

AUG 13 2019

Office of the Secretary

David Michaels, Assistant Secretary
U.S. Department of Labor
Office of the Assistant Secretary
Occupational Safety and Health Administration - Room: S2315
200 Constitution Avenue
Washington, D.C. 20210

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Dear Dr. Michaels:

On March 29, 2013, the FCC opened a *Notice of Inquiry (Inquiry)* to consider whether recent research into the possible health effects of radiofrequency (RF) emissions, changes in usage patterns of RF emitters of all types, and various recent standards-setting activities warrant a reexamination of the FCC's exposure limits and policies for all regulated sources of RF emissions.¹ In its *Inquiry*, the FCC specifically solicited input from federal safety and health agencies and institutes on the propriety of our present exposure limits. The Government Accountability Office (GAO) also indicated that the FCC should solicit such expert opinion.²

The FCC is not a safety and health agency, and we defer to other organizations and agencies such as yours to interpret the biological research necessary to assess the health impact of RF emissions, and to determine what exposure levels can be considered safe for humans. The FCC has in the past relied on recommendations from federal safety and health agencies and institutes, including OSHA, in adopting its present rules limiting human exposure to RF energy.

The public response to the *Inquiry* forms a significant portion of the record in this proceeding. As we continue our analysis of the issues addressed and information sought in the *Inquiry*, I encourage OSHA to submit substantive comments to the FCC responding to the various issues the *Inquiry* raised.

Your views are appreciated on all matters on which you may wish to comment. The FCC would also be particularly interested in OSHA's input on whether our occupational guidelines are appropriately related to the public/general guidelines and whether or how they should be changed in concept and/or specifics if there is a change in our basic public exposure provisions. While much research and alternative standards used elsewhere are referred to in the *Inquiry*, we welcome information regarding your evaluation of any other potentially pertinent research, extant alternative standards, or scientific examinations with which you are familiar. In the *Inquiry*, the FCC acknowledged the "precautionary" measures endorsed by some parties, and we

¹ See *Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies*, Notice of Inquiry, ET Docket No. 13-84, FCC 13-39, March 29, 2013, available at: http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-13-39A1.docx.

² See *Telecommunications: Exposure and Testing Requirements for Mobile Phones Should Be Reassessed*, U.S. Government Accountability Office, GAO-12-771, July 24, 2012, available at: <http://www.gao.gov/products/GAO-12-771>.

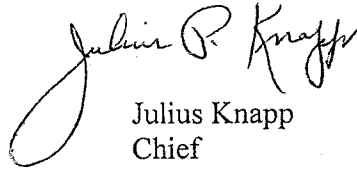
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would appreciate your input on whether any such extra precaution is necessary. We would also particularly appreciate your views on whether the FCC's current whole-body average SAR limit of 0.4 W/kg and localized SAR limit of 8 W/kg, applied continuously, remains appropriate for workers, given the body of health research, changes in usage, standards-setting activities, or any other factors, that were not available when the FCC established its current guidelines in 1996.

If you need any additional information, you may contact Bruce Romano, Associate Chief of our Office of Engineering and Technology, at Bruce.Romano@fcc.gov or by telephone at (202) 418-2470.

Sincerely,

A handwritten signature in black ink, appearing to read "Julius R. Knapp". The signature is fluid and cursive, with a large initial "J" and "K".

Julius Knapp
Chief
Office of Engineering and Technology