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Arthur Firstenberg
Cellular Phone Taskforce
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January 7, 1998

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Re: Disabilities Issues Task Force
ET Docket 93-62

Dear Mr. Caton:

Enclosed are 4 copies and an original of Notice and Comments which were sent to Dr. Robert Cleveland this day in the matter of the Appeal of the Cellular Phone Taskforce's Disability Discrimination Complaint of Feb. 2, 1997.

Sincerely,

Arthur Firstenberg
Arthur Firstenberg
President

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION

In the Matter of)
)
Complaint of Discrimination) Disabilities Issues Task Force
on the Basis of Handicap)
Filed by the Cellular Phone)
Taskforce on February 2, 1997)
)
Guidelines for Evaluating the) ET Docket No. 93-62
Environmental Effects of)
Radiofrequency Radiation)

NOTICE AND COMMENTS

1. The Board of Directors of the Cellular Phone Taskforce includes Kathy Hawk, Dr. Duane Dahlberg, and Arthur Firstenberg. Kathy Hawk and Arthur Firstenberg are electrically sensitive.

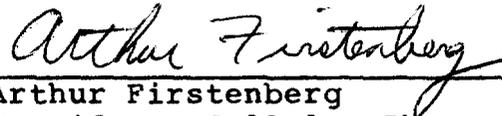
2. The Cellular Phone Taskforce notes that the wide variation in sensitivity to microwave radiation in human beings is paralleled by an extraordinary variation in induced currents in the body which is already documented in the record in ET Docket 93-62. Thus the IEEE C95.1-1991 Standard, on p. 29, states that the Maximum Permissible Exposure for controlled environments for electric field strength could produce induced currents in a standing adult at 3 MHz which is more than 6 times the threshold for RF burns. As the MPE for uncontrolled environments is supposed to include a safety factor of 50, therefore the power density limits would need to be set $6.1^2 \times 50$ or about 2000 times lower than presently set limits for controlled environments, or 400 times lower than presently set for uncontrolled environments, to protect the general population under all circumstances against thermal burns

from induced currents. Exhibit 41 submitted by the Ad-Hoc Association of Parties on July 14, 1997, a paper by Om Gandhi et al., shows that reflection from flat surfaces can enhance the Specific Absorption Rate (SAR) up to about 7 times, and that reflection from corner surfaces can enhance the SAR up to an additional 27 times. Table 1 demonstrates that at resonance in electrical contact with ground plane, in a 90° corner reflector, the SAR can actually be increased from 0.27 W/kg to 116.48 W/kg, or about 430 times. Exhibit 95 submitted by the Ad-Hoc Association of Parties on July 14, 1997, a paper by Davias and Griffin, demonstrates that metal eyeglass frames can increase exposure of the eyes an additional 100 times. Thus to protect the eyes--from a thermal hazard only--would require reducing allowable power density levels by a factor of 400 x 430 x 100, or 17,000,000, i.e. down to levels of 1 nW/cm² or less. No studies have been done on the enhancement factors caused in other parts of the body by other metallic objects, such as fillings in teeth, underwire bras, hearing aids, prostheses, rods, plates, and screws installed surgically, etc.

The electrically sensitive are those members of society who are handicapped by virtue of having been injured, and sensitised, by electromagnetic radiation. The Cellular Phone Taskforce respectfully submits that evidence which has been long before the Commission is enough to demonstrate an extraordinary variation in actual exposure to microwaves and radio waves among the general population which is bound to

result in injury and sensitization of a significant portion of them unless maximum permissible exposures are reduced by a factor of at least one million. This will protect from thermal injury at least.

Respectfully submitted,



Arthur Firstenberg
President, Cellular Phone Taskforce
Post Office Box 100404
Vanderveer Station
Brooklyn, New York 11210
(718) 434-4499

Date: January 7, 1998

Verification: I declare under penalty of perjury that the foregoing is true and correct. Executed on January 7, 1998.


Arthur Firstenberg

Arthur Firstenberg
Cellular Phone Taskforce
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Brooklyn, New York 11210
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January 7, 1998

Dr. Robert Cleveland
Office of Engineering and Technology, F.C.C.
2000 M Street, N.W., Suite 266
Washington, DC 20554

Re: Appeal of the Cellular Phone Taskforce
Disabilities Issues Task Force
ET Docket 93-62

Dear Dr. Cleveland:

Enclosed please find Notice and Comments in support of the Appeal, referenced above, of Complaint of Discrimination filed Feb. 2, 1997.

Sincerely,



Arthur Firstenberg
President

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