



November 19, 2015

The Honorable Thomas Wheeler
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Regarding:

Proposed Changes to the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields.

Dear Mr. Chairman:

The Mechanical Contractors Association of America (MCAA) is a non-profit construction trade association representing more than 2,500 firms involved in the mechanical construction and service industry nationwide and overseas. These firms employ more than 270,000 union workers.

This letter follows MCAA's August 16, 2014 letter to you regarding the potential for mechanical service technicians to be overexposed to radio frequency radiation while performing work on heating, ventilation, and air conditioning equipment on building rooftops. The association is concerned that mechanical service technicians may at times be unwittingly overexposed to radiofrequency (RF) radiation because their employers are rarely informed about the presence of and the potential hazards associated with telecommunications antennas.

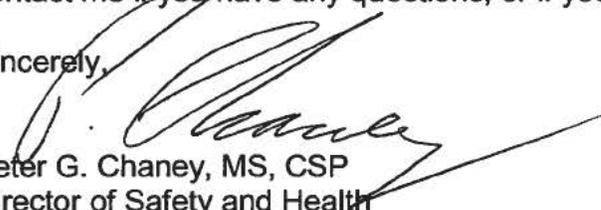
MCAA respectfully requests that the commission consider adding language to its final rule, based on the following bullet points, to help protect affected workers from overexposure to RF radiation.

- When one or more RF transmitting antennas are present on a building rooftop the affected FCC licensee(s) should be required to generate and provide brief, user friendly *RF Radiation Exposure Summary Reports* to all affected building owners, building managers, and building management companies. Each completed form should include:
 - the number of telecommunications antennas their company has installed on the rooftop;
 - the type(s) of antenna, i.e. microwave, cellular, FM broadcast, satellite, portable radio, etc.;

- precisely where each antenna is located;
 - whether any of their antennas are “stealth antennas”, and if so, how they can be identified;
 - how much RF radiation is generated from the antenna or antennas (exposure level ranges);
 - what direction, or directions the RF radiation is emitted; and
 - the minimum safe work distance from the antenna or antennas when the RF field is projected across the rooftop where workers could be exposed.
- All affected building owners, building managers, and building management companies should be required to inform all of their affected contractors and subcontractors about the presence of RF transmitting antennas, and provide them with a copy of the *RF Radiation Exposure Summary Reports*.

MCAA thanks you in advance for considering these recommendations. Please feel free to contact me if you have any questions, or if you need further assistance.

Sincerely,



Peter G. Chaney, MS, CSP
Director of Safety and Health