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November 12, 2015

The Honorable Thomas Wheeler  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington DC 20554

Dear Chairman Wheeler:

We continue to be concerned about the thousands of construction workers who are put at risk daily of being exposed to harmful levels of radio frequency (RF) radiation generated by wireless antenna systems across the country.

On September 17, 2015 Senator Blumenthal and Congresswoman Eshoo issued a press release and sent you a letter expressing their concern for these third-party, construction workers – roofers, electricians, painters, masons, HVAC repairmen, and other workers – who perform their tasks on rooftops, sides of buildings, and other structures, often directly in front of antennas that produce many hundreds of times the RF radiation of ordinary cell phones.

That same day, CTIA, the wireless industry's trade organization, went on the defensive by using a World Health Organization (WHO) document, which, *in part*, concluded the *public* is safe from the negative effects of RF radiation at wireless transmission sites to downplay the risk to workers.

The WHO's statement, however, relates to the potential for exposure for individuals in *publicly* accessible areas, such as people walking at street level in front of buildings with rooftop antennas. *The WHO statement does not pertain to unaware third-party workers who perform their duties in close proximity (within about 30 feet) to hazardous RF transmitting antennas.* As Senator Blumenthal and Congresswoman Eshoo pointed out, the risk faced by these workers is very real and has not been adequately addressed by the industry and the regulators.

Although they acknowledged the FCC's Mach 27, 2013 Report and Order reminding the wireless carriers of their obligation to address the worker exposure issue, they point out that this obligation has not been met, as

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evidenced by the tens of thousands of workers still at risk of exposure to harmful levels of RF radiation in excess of the existing FCC human exposure limits.

Unfortunately, the industry's response continues to reflect a total disregard for the health and wellbeing of workers being injured from their active antennas. It is long past time to end this shell game and protect American workers.

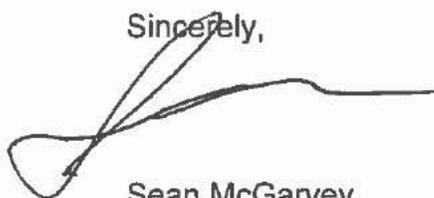
Our understanding is that the FCC is in the final stages of addressing this issue through its ongoing Notice of Proposed Rulemaking (NPRM). We hope that the FCC's final rules require the cellular companies to protect all at-risk workers, especially our members, with the same level of protection enjoyed by the wireless industry's own workforce.

This can be accomplished through a joint effort of all FCC licensees, site owners, contractors, workers, and others. Construction employers and their employees must be provided with RF radiation safety training, ready access to up-to-date site-specific RF safety information, including the location and exposure associated with the visible and "stealth" antennas, and the ability to have RF emitting antennas shut off in a timely manner when workers are required to work in close proximity.

As the FCC prepares final rules under the open NPRM, please keep in mind that in addition to wireless industry workers, thousands of third-party workers, including our members, are exposed to RF radiation and their safety is of utmost importance.

Thank you for your continued attention to this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean McGarvey". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Sean McGarvey  
President