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United Union of Roofers, Waterproofers & Allied Workers™

November 20, 2015

OFFICE OF THE
INTERNATIONAL PRESIDENT
Kinsey M. Robinson

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

Dear Chairman Wheeler:

The United Union of Roofers, Waterproofers and Allied Workers is a labor organization that represents 22,000 roofers and waterproofers. We continue to be concerned about our members who are exposed daily to the harmful effects of radio frequency (RF) radiation emanating from wireless antenna systems on rooftops across the country.

Sources of RF energy on a rooftop often are not obvious and usually are not properly marked or defined as danger zones by warning signs. In many cases, for aesthetic reasons, transmitters or antennae are hidden by building elements that can obscure their presence yet not reduce the risk of serious harm to unsuspecting workers. Our members are left unaware and unprotected from the physical and mental harm the wireless antennas produce.

This problem continues to expand with the staggering demand for wireless services and the corresponding antenna growth. It is critical that the FCC promulgates a rule that would require stronger RF monitoring and safety regulations that would protect roofers and all at-risk workers not just those employed in the telecommunications industry.

Our understanding is that the FCC is in the final stages of addressing this issue through its ongoing Notice of Proposed Rulemaking (NPRM). We urge you to move forward as soon as possible and promulgate a rule that ensures the health and safety of our members and all workers. Cellular companies must be required to protect all at-risk workers, especially our members, with the same level of protection afforded 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 workers and employers must be provided with RF radiation safety training, up to date site-specific RF safety information, including the location and exposure associated with visible and "stealth" antennas, and the ability to shut off RF emitting antennas when workers are performing their tasks in close proximity.



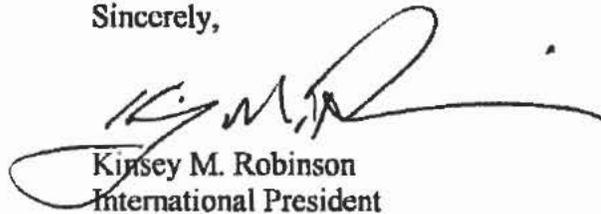
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Thousands of workers, and particularly our members, are exposed to RF radiation. Please keep this in mind when you issue your final rules under the open NPRM. FCC licensees have an obligation to address the exposure issue and must be held accountable for failing to implement the necessary safeguards to protect all workers.

Thank you for your attention to this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kinsey M. Robinson', with a long horizontal flourish extending to the right.

Kinsey M. Robinson
International President

KR/jr