

## Gil Amelio

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January 21, 2016

The Honorable Tom Wheeler, Chairman  
Federal Communications Commission  
445 12<sup>th</sup> St., Southwest  
Washington, D.C. 20554

Dear Chairman Wheeler,

As I'm sure you know, I've been a part of the communication industry for 48 years. I started out at Bell Labs; worked up to become the president of Rockwell Communications Systems, CEO of National Semiconductor, CEO of Apple Computer as well serving for 18 years as a board member of AT&T. I care deeply about this industry and the people who make it what it is. It's been my life's work. The growth of the wireless industry has been staggering. Who would have guessed the incredible number and variety of transmitters needed to support the insatiable consumer and business demand for wireless services?

I write today to discuss how to keep this engine running in a responsible manner recognizing that our growth has brought far more people into close proximity with RF transmitters than we ever expected. While the FCC laudably has specific rules prohibiting all but specially trained workers from working close to these transmitters, the new ubiquity of our facilities and the location of transmitters in more accessible areas than in the past means that large numbers of civilians and third-party workers—roofers, painters, and firefighters for example—render your rules for protecting the population from over-exposure areas out of date. The days of relying on locked fences and signs for this task, tools designed for the environment of 30 years ago when most transmitters were high on TV and radio towers, are unworkable in today's world of transmitters on every roof and building side, concealed behind camouflaged facades, on light poles and in public rights of way.

I had hoped that our industry would recognize its responsibility and address this problem on its own. But it has not. It appears that some carriers are continuing to ask the FCC to grant them a safe harbor for merely maintaining the antiquated system of signs and fences that fails to protect workers in today's wireless environment. When I was building equipment for the emerging mobile communications industry at Rockwell in the '80's (by the way when you and I first met), most transmitters were sited high on isolated monopoles. Protecting workers with locked fences and signs in this pre-internet world worked. But that world no longer exists and our nation's workforce and civilians still deserve to be protected. We do not have to trade an expansion of the wireless network for safety. Rather, I want our industry to lead the way.

I understand that the FCC is already considering new rules on this topic and has already gathered comments. Mr. Chairman, I believe at this critical point in time you have a unique opportunity to

assist in protecting workers and others and to lead the industry into continued growth. To do so, I respectfully request that you consider the following principles for new 21st Century rules for a 21st Century challenge: (1) a safety system must facilitate communications between all stakeholders (multiple co-located licensees, government RF users, building owners, workers and the FCC) and today's "silo" system of different approaches for each licensee and participant must end; (2) a safety system must provide not only licensee employees, but third-party workers and others with site-specific RF safety information prior to coming in contact with an RF site; and (3) a safety system must be administered by a neutral and independent third party.

Such a system will not only protect workers, as we must, but will protect our industry while we still have a chance. If we do nothing, hoping that the current system of plastic cones/chains and signs will do the job, third-party workers and others will not be the only ones to pay a steep price. As a result of not protecting workers and others from RF radiation injuries, our industry could end up in an asbestos-style litigation. This will involve all wireless stakeholders; site owners, contractors, insurers, municipalities, utility companies and others. All of this would slow the pace of deployment, frustrate consumers and impact your goals for high quality ubiquitous mobile services.

I know you understand the gravity of this matter and I would like to discuss this issue with you at your earliest convenience.

Sincerely,



Gil Amelio