

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Notice of Proposed Rulemaking)	
18 FCC Rcd 13187, 13188 ¶1 (2003))	ET Docket No. 03-137
)	
And)	
)	
Service Rules for the Advanced Wireless Services)	WT Docket No. 12-357
H Block---Implementing Section 6401 of the)	
Middle Class Tax Relief and Job Creation Act of)	
2012 Related to the 1915-1920 MHz and)	
1995-2000 MHz Bands ¶53 footnote 95)	

To: Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Comment Filed by:

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February 5 , 2013

AFFIDAVIT OF Prof. Om P. Gandhi

I, Om P. Gandhi, attest that my statements are true to the best of my knowledge.

Comment round for ET Docket No. 03-137 and WT Docket No. 12-357.

1. My name is Om P. Gandhi . My address is University of Utah, Department of ECE , 3280 MEB, 50 S. Central Campus Drive, Salt Lake City, UT 84112.
2. I am a Professor of Electrical & Computer Engineering.
3. I have conducted research in the area of Bioelectromagnetics –Safety and Medical Applications of Electromagnetic Fields since 1973, i.e. over a period of 40 years. I am credited with having demonstrated resonance of the human body absorption back in 1974/1975—a result that led to reduction of safety standards for electromagnetic fields first in the U.S. followed by other countries of the world.
4. As a part of my research, we compared the implication of various safety standards i.e. the IEEE Std. C95.1, 1999 Edition; the ICNIRP Std. 1998 and the recently proposed IEEE Std. , 2005 Edition . The latest 2005 IEEE Standard with the relaxed limit of 4.0 W/Kg for any 10gram of pinna tissue was compared in detail as against the presently used FCC Std. (the IEEE Std.C95.1-1999 Edition allowing 1.6 W/kg for any one gram of tissue). We obtained the following result, **“ the IEEE Std., 2005 with the relaxed limit of 4.0 W/kg for any 10 grams of pinna tissue will allow (cell phone) radiated powers that may be 8-16 times those permitted by the current (IEEE Std. C95.1, 1999 Edition) and up to two times higher than those permitted under ICNIRP Guidelines used in over 30 countries”** It was published in IEEE Transactions for Microwave Theory and Techniques vol 52(8) pp.:2004-2012, August 2004 [O.P.Gandhi and G.Kang authors see uploaded copy of the paper]
5. A major implication of this result is the new IEEE Std. 2005 will result in the radiated powers of the cell phones being increased hugely as compared to those allowed at present anywhere in the world.

6. Because the science shows that the current FCC allowable radiated power in the FCC RF Safety Standard may be 8-16 times higher than the radiated power permitted by the current IEEE Std. C95.1, 1999 Edition AND up to two times higher than the radiated power permitted under ICNIRP Guidelines which are used in over 30 countries worldwide, I respectfully request that the US FCC RF Safety Standards be immediately updated to be more protective of public health.

Respectfully submitted by

A handwritten signature in black ink, appearing to read 'Om' with a stylized flourish.

Om P. Gandhi

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February 5, 2013