

We have great concerns regarding the FCC's proposal to open up the upper and lower H Block spectrum to further wireless communications. The current guidelines for radiofrequency radiation limitations are inadequate as they are not biologically based and not consistent with current toxicological research. How can the FCC consider opening up more frequencies if the guidelines are insufficient to protect people and animals from harm? It is the duty of the FCC to protect the public from harm due to radiofrequency radiation emissions.

We have an enormous problem on our hands as RF-emitting devices have multiplied exponentially over the past 15 years. This is the cigarette of the 21st century, except that we can't see or smell it, and we can't get away from it. What options do we have to protect ourselves from a hazard so far-reaching? Manufacturers, sellers and installers of radiofrequency-emitting equipment are citing their product is safe based on FCC guidelines. This puts the public in a compromising situation. Therefore, the FCC must work towards biologically-based radiofrequency radiation limitations. Here are some points to consider:

1) FCC guidelines for radiofrequency radiation limitations do not address an upper limit of cumulative exposure from all forms of microwave/radiofrequency radiation.

2) FCC guidelines do not address patterns of exposure such as pulses in cell phones or smart meters. Time-averaging hides the actual peak levels being emitted by various devices. There is no regulation on the upper limit of peak pulses. See FCC rules, section 2.1091(d). Also, see letter from FCC to concerned resident regarding the installation of smart meters?  
[http://www.kremc.com/smart\\_moves/adv-meter-pdf/FCC-Letter-on-Smart-Meter-RF-exposure.pdf](http://www.kremc.com/smart_moves/adv-meter-pdf/FCC-Letter-on-Smart-Meter-RF-exposure.pdf).

3) FCC guidelines are specific to thermal exposure, not long term non-thermal exposure per Norbett Hankin of the Center for Science and Risk Assessment, July 16, 2002.  
[http://www.emrpolicy.org/litigation/case\\_law/docs/noi\\_epa\\_response.pdf](http://www.emrpolicy.org/litigation/case_law/docs/noi_epa_response.pdf).

4) On May 5, 2011, the WHO IARC (International Agency for Research on Cancer) press release # 208, classifies radio frequency electromagnetic fields as possibly carcinogenic (Group 2B) to humans group. [http://www.iarc.fr/en/media-centre/pr/2011/pdfs/pr208\\_E.pdf](http://www.iarc.fr/en/media-centre/pr/2011/pdfs/pr208_E.pdf).

If the FCC does not consider the health and safety of the people of this nation to be its responsibility, then they should request that Congress direct the EPA to establish biologically-based radiofrequency radiation safety limits and supply what is needed to accomplish this in terms of finances and resources.