

**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: **B. Blake Levitt**  
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(blakelevit@cs.com)

February 6, 2013

## **AFFIDAVIT OF B. Blake Levitt**

I, B. Blake Levitt 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 B. Blake Levitt .
2. My mailing address is P.O. Box 2014, New Preston, CT 06777.
3. I am a former *New York Times* writer, medical/science journalist, and author of two books on the health/environmental effects of nonionizing radiation.
4. As a science journalist, I have been contacted by thousands of people since my first book, *Electromagnetic Fields, A Consumer's Guide to the Issues...* was published in 1996 by Harcourt Brace -- people who developed adverse reactions when cell towers were placed in neighborhoods, or they had unknowingly created their own exposures after installing domestic wifi routers or DECT phones. The most recent complaints now come from people after smart meters have been installed on homes and/or apartment buildings. Many had no symptoms prior, nor did they have preconceived ideas that there was anything problematic with the technology. The symptoms took them by surprise. Many had been to numerous doctors without relief. Some were medical practitioners, including several MD's -- all unknowledgeable about potential biological effects from low-level nonionizing radiation until experienced personally. It became clear that there is a subset of the population capable of reacting badly to low-level nonionizing radiation far below the FCC's standards -- exposures at intensities within FCC categorical exclusion. Most of the people who have contacted me did not know previously that there is a syndrome called "electromagnetic hypersensitivity." In other words, there was no pre-existing bias and most felt positive about wireless technologies. Symptoms were both gradual and sudden onset, including headaches, dizziness, concentration problems ('brainfog'), insomnia, flu-like symptoms and tremors, among others. When people reduced exposures, which included choosing wired products, shielding, and/or moving, they reported symptom reduction and feeling better, although for some, full health never returned and they have been forced to move to rural environments. With the new FCC proposal for

nationwide wifi, even these rural environments will no longer suffice for such people.

5. Hundreds of peer-reviewed studies have shown negative impacts of EMR on human health, at low levels of exposure.
6. Please read the 2010 peer-reviewed paper published in *Environmental Reviews*, entitled, “Biological effects from exposure to electromagnetic radiation emitted by cell tower base stations and other antenna arrays” that I co-wrote with Henry Lai, Ph.D. We cited over 50 studies of biological effects occurring at intensities far below FCC standards. Please use these important scientific findings to immediately update the FCC RF Safety Standards to be more protective of public health.
7. In May 31, 2011, after years of careful deliberation, the World Health Organization's International Agency for Research on Cancer (IARC) classified radiofrequency fields as a 2B “possible” carcinogen. The FCC’s standards do not adequately address biological impacts and need to be updated according to more current biological models. Current standards are obsolete, based solely on acute, short-term thermal effects. They do not address chronic, low-level, long-term exposures – the most common today, or take cumulative exposures from myriad sources into consideration. Nor do the present standards – or the standards issued by the International Council on Non-Ionizing Radiation Protection (ICNIRP) -- address the current state of the peer-reviewed science that EMF emissions are biologically toxic and carcinogenic. Under no circumstance can low-level exposures below current FCC standards be considered biologically inert. A majority of the science since 1996 has found the opposite.
8. The FCC should not “harmonize” our current standards with ICNIRP’s, which are more lenient in some frequencies.
9. I strongly urge the FCC to: (1) Update the RF safety standards to be more protective of the public health, particularly women, children, workers, the disabled, and the elderly from possible adverse exposures to EMF emissions. (2) I urge the FCC to adopt and use the updated standards as stringent, enforceable technical requirements for all transmitters within the FCC’s radiofrequency jurisdiction. (3) I urge the FCC to re-establish regional field offices to better monitor ambient background levels, especially in the presence of multiple transmitters. (4) I urge FCC to eliminate categorical exclusions through which many current wireless technologies enter the marketplace, untested, and potentially unsafe. (5) I urge the FCC to take peak exposures into consideration rather than time-averaging exposures – a method that serves to negate the most pertinent biological factor. (6) I urge the FCC to issue warnings and create standards regarding cumulative exposures from myriad sources.

(7) I urge the FCC to create a special division where adverse health complaints may be filed and/or recommend that another regulatory agency establish such a division. At present, there is no such data collection, people are reacting adversely, but there is nowhere to collect that information at a useful government level.

Respectfully submitted by

A handwritten signature in black ink that reads "B. Blake Levitt". The signature is written in a cursive style with a large, stylized initial "B".

B. Blake Levitt

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