

Thank you for allowing me to comment about reevaluating the FCC's radiofrequency radiation limits. I am urging the FCC to lower the RFR limits due to the IARC of the World Health Organization classified radiofrequency radiation as a class 2B possible carcinogen in May 2011.

2012 BioInitiative Report classifies radiofrequency radiation as a carcinogen. Also, this report states RFR has a detrimental affect on children:

"There is good evidence to suggest that many toxic exposures to the fetus and very young child have especially detrimental consequences depending on when they occur during critical phases of growth and development (time windows of critical development), where such exposures may lay the seeds of health harm that develops even decades later. Existing FCC and ICNIRP public safety limits seem to be not sufficiently protective of public health, in particular for the young (embryo, fetus, neonate, very young child).

The Presidential Cancer Panel (2010) found that children are at special risk due to their smaller body mass and rapid physical development, both of which magnify their vulnerability to known carcinogens, including radiation.

The American Academy of Pediatrics, in a letter to Congressman Dennis Kucinich dated 12 December 2012 states "Children are disproportionately affected by environmental exposures, including cell phone radiation. The differences in bone density and the amount of fluid in a child's brain compared to an adult's brain could allow children to absorb greater quantities of RF energy deeper into their brains than adults. It is essential that any new standards for cell phones or other wireless devices be based on protecting the youngest and most vulnerable populations to ensure they are safeguarded through their lifetimes."

"Public safety standards are 1,000 to 10,000 or more times higher than levels now commonly reported in mobile phone base station studies to cause bioeffects. The FCC has a duty to the public to protect the public health and safety from harm from radiofrequency radiation.

US citizens and tax payers deserve radiofrequency radiation safety limits based on biology, not physics. In order for the FCC to fulfill its Congressional mandate to protect the public health and safety from harm from radiofrequency radiation it must update its RF safety regulations.

"In the Telecom Act of 1996 Congress directed the FCC to set its own RF safety regulations for emissions from Personal Wireless Services Facilities (PWSF). The House Committee on Commerce said it was the Commission's responsibility to adopt uniform RF regulations "with adequate safeguards of the public health and safety." (H.R. Report No. 104-204, p. 94)

The FCC's failure to protect the health and safety of citizens by providing updated biologically-based RF safety limits on electromagnetic radiation exposure goes to the heart of the Chevron and Massachusetts v. EPA rulings on an agency's authority to disregard its Congressional mandate. Such

agency action and inaction are "arbitrary and capricious...[and] otherwise not in accordance with law."  
(Massachusetts v. EPA, 549 U.S. 497, 534-535 (2007))

FCC does not possess the expertise to set biologically-based radiofrequency radiation safety limits. EPA does. Therefore, the FCC should advocate that Congress direct the EPA to establish biologically-based radiofrequency radiation safety limits and provide the budget and resources to carry out that task.

Compliance with FCC radiofrequency radiation limits is often cited as an excuse to ignore evidence of harm by transmitting utility meters and force harmful exposure on people against their will. In our home we choose not to use our microwave, have hardwired internet, use corded phone and turn our cell phones off while at home. Our electric utility provider recently forced, with police escorts, a wireless smart meter on our home. Our utility even arrested two women who tried to refuse the wireless meter on their home. They were concerned that the wireless smart meter will harm their health.

A moratorium should be placed on sales of new spectrum, transmitting utility meter installation, and installation of additional base stations for wireless service while biologically-based safety limits are being developed.

I urge you to lower the RFR limits. Thank you for hearing me.