

Re; FCC 13-39
re: ET Docket No. 13-137

We request the rule changes to include the limits for induced and contact current as set in the ANSI/IEEE C 95.1 2005 standard. This would greatly help people to understand that, particularly at low frequencies, induced and contact current are as much or more of an issue than body heating created at these frequencies. At this time OSHA can enforce the occupational limit but no entity that we are aware of enforces the uncontrolled limit. This change in the rules would mostly affect some amateur stations as well as AM, and AM detuned facilities.