



Federal Communications Commission
Washington, D.C. 20554

August 5, 2013

ACCEPTED/FILED

AUG - 5 2013

Federal Communications Commission
Office of the Secretary

John E. Deasy, Ph.D.
Superintendent of Schools
Los Angeles Unified School District
Administrative Office
333 South Beaudry Avenue, 24th Floor
Los Angeles, CA 90017

ET Docket No. 13-84

Dear Dr. Deasy:

Thank you for your letter dated May 13, 2013, to former Chairman Genachowski on the subject of radiofrequency ("RF") exposure limits. You requested that "the FCC [] thoroughly evaluate the body of scientific studies which address non-thermal effects and establish an appropriate exposure standard for children."

The Commission shares the concerns of parents and teachers that Federal regulations protect the health of the public with respect to exposure to RF emissions in all locations, including classrooms. The policy of the FCC with respect to environmental RF emissions was developed to ensure that FCC-regulated transmitters do not expose the public or workers to levels of RF energy that are considered by organizations expert on human health and safety to be potentially harmful. Since the FCC is not a health and safety agency itself, we must defer to other organizations and agencies with respect to interpreting the biological research necessary to assess the health impact of RF emissions, and to determine what levels are safe. In 1996, the Commission adopted its current guidelines for human exposure to RF energy based on recommendations from the Environmental Protection Agency (EPA), the Food and Drug Administration (FDA), and other federal health and safety agencies. These recommendations were derived from guidelines issued in the United States by the Institute of Electrical and Electronics Engineers, Inc. (IEEE), and the National Council on Radiation Protection and Measurements (NCRP). The IEEE and NCRP had commissioned highly experienced and knowledgeable scientists and engineers to evaluate published scientific studies, including studies of the health status of persons exposed to RF radiation, to establish safe levels for human exposure to RF energy.

While the expert U.S. and international organizations continue to expressly find no established link between RF exposure and adverse health effects, we recognize that it has been many years since we conducted a formal review of our RF exposure limits and implementation practices. As you mention in your letter, the Commission recently opened a formal *Notice of Inquiry (Inquiry)* into whether recent research, standards setting activities and usage patterns of RF emitters of all types warrant a reexamination of the FCC's exposure limits for all regulated sources of RF emissions.¹ In our *Inquiry*, we specifically solicit input from federal health and safety agencies and institutes on this issue.

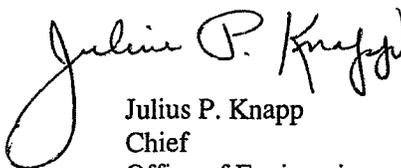
With respect to the engineering task of determining potential RF exposure levels in individual circumstances, we suggest accessing our Office of Engineering and Technology (OET)

¹ See: http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-13-39A1.pdf The Inquiry begins at paragraph 205.

Bulletin No. 65, *Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields* available at: <http://www.fcc.gov/encyclopedia/oet-bulletins-line#65>. The far-field exposure level or power density from wireless devices (including access points) are commonly estimated from equation (3) on page 19 of OET Bulletin No. 65.

We appreciate your interest and efforts with respect to this important matter, and your letter will be added to the record in the proceeding of our *Inquiry* (ET Docket No. 13-84). In addition, you are encouraged to add any comments, and particularly any authoritative scientific information, directly into the record using the Commission's Electronic Comment Filing System (ECFS). To submit comments, go to <http://apps.fcc.gov/ecfs/upload/> and type in the proceeding (docket) number (13-84), as well as contact information and associated filing details. The standard file formats for submitting filings to ECFS are Word, PDF, or Excel files. If there are any questions about this system, please feel free to contact our ECFS Help Desk: Phone: 202-418-0193; Email: ecfshelp@fcc.gov.

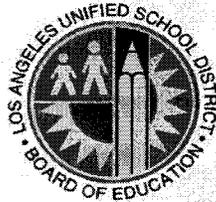
Sincerely,

A handwritten signature in black ink, reading "Julius P. Knapp". The signature is written in a cursive style with a large, looping initial "J".

Julius P. Knapp
Chief
Office of Engineering and Technology

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LOS ANGELES UNIFIED SCHOOL DISTRICT

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**JOHN E. DEASY, PH.D.
SUPERINTENDENT OF SCHOOLS**

May 13, 2013

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Attn: Julius Genachowski, Chairman

ET Doc. No. 13-84

Received & Inspected

MAY 28 2013

FCC Mail Room

SUBJECT: RADIOFREQUENCY EXPOSURE LIMITS

Dear Mr. Genachowski,

The Los Angeles Unified School District (District) requests your assistance in determining the potential radiofrequency (RF) exposures to students who utilized wireless devices within a classroom setting and establishing an appropriate exposure standard for children.

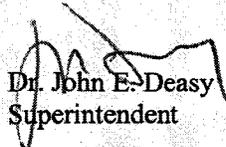
In order to comply with new State of California instructional guidelines (Common Core State Standards and Assessments), the District will issue technology devices such as computers, laptops and tablets to students and provide wireless internet connectivity to classrooms. However, with the proliferation of wireless devices introduced into the classroom, some teachers and parents have raised concern that the District may be exposing children to excessive RF radiation.

Since 2007, the District has taken steps to reduce exposures to students by adopting use and equipment specifications such as measured distances from access points/external antennas and limits on device power ratings. It is believed that a more conservative level is necessary to protect children, who represent a potentially vulnerable and sensitive population. Therefore, we have established a threshold of 0.1 $\mu\text{W}/\text{cm}^2$ or 10,000 times lower than the current FCC standard.

The District recently learned that the FCC is proposing to open a docket to consider the efficacy of the current RF exposure limits and whether additional precautions are appropriate. In light of the District's upcoming one-to-one technology program, we urge the FCC to thoroughly evaluate the body of scientific studies which address non-thermal health effects and establish an appropriate exposure standard for children.

We look forward to the FCC's timely review and consideration of this critical issue and thank you in advance for your efforts on behalf of our students. If you should have any questions, please do not hesitate to contact John Sterritt, Director of Environmental Health and Safety at (213) 241-3199.

Sincerely,


Dr. John E. Deasy
Superintendent

c: Members, Board of Education
Enrique G. Boull't
Mark Hovatter
Ronald Chandler
John Sterritt