

**Aug. 22, 2013**

## **Comments to the Federal Communications Commission (FCC) regarding exposure guidelines to Wireless Radiation Notice of Inquiry, ET Docket No. 13-84**

- **Use “the precautionary principle”, widely used in Europe, rather than allowing unbridled growth of wi-fi.**

*Don't allow any more wi-fi until you have done or read research about the negative health effects of Wi-fi. Don't make people and animals guinea pigs. Research, mostly done outside the U.S., shows many negative health effects. This should be used to regulate and limit the use of wi-fi in the U.S. Instead, industry is forging ahead to make a profit and the FCC and other government agencies are allowing it to happen. Even organizations like the American Cancer Society seem to be led by donations from industry, rather than by protecting citizens.*

- \* **I want biologically based RF/MW exposure guidelines that protect from non-thermal health effects.**

*Current guidelines only allege to protect for thermal heating. FCC's power density value should be lowered from 1,000 uW/cm<sup>2</sup> to 0.0003 uW/cm<sup>2</sup>. Ref. **THE BIOINITIATIVE REPORT 2012 A Rationale for Biologically-based Public Exposure Standards for Electromagnetic Fields (ELF and RF)** - <http://www.bioinitiative.org/>*

- \* **Stop using SAR. Start using only electric field based power density values for the RF/MW exposure standard.**

***Currently two values are used.** One for near field (holding a phone to your head or lap top on your lap) and one for far field (all other exposure). Near field value is Specific Absorption Rate (SAR) which uses a probe in dead animal tissue to measure for a heating effect. Far field value is a power density unit which is calculated from the actual electric field values. **The FCC wants to move to SAR only.** This is absolutely wrong as SAR has no relation to non thermal effects, cannot be verified by measurements in the field and does not take into account additional transmitters that may be present in real life conditions. Ref. - **Evaluation of Specific Absorption Rate as a Dosimetric Quantity for Electromagnetic Fields Bioeffects***

<http://www.plosone.org/article/info%3Adoi%2F10.1371%2Fjournal.pone.0062663>

- \* **Safety standards for sensitive populations need to be set at lower levels than for healthy adult populations.**

*Sensitive populations include the developing fetus, the infant, children, the elderly, those with pre-existing chronic diseases, and those with developed electrical sensitivity (EHS). A child's brain has double the permittivity of an adult's brain. [Ref. **THE BIOINITIATIVE REPORT 2012 A Rationale for Biologically-based Public Exposure Standards for Electromagnetic Fields (ELF and RF)** -*

*<http://www.bioinitiative.org/> and <http://www.plosone.org/article/info%3Adoi%2F10.1371%2Fjournal.pone.0062663> **Evaluation of Specific Absorption Rate as a Dosimetric Quantity for Electromagnetic Fields Bioeffects**]*

**\* How I have been harmed from RF/MW exposure.**

I have not been hurt because I wear an electro-magnetic field protector 24/7. There are hundreds of cell towers and antennae within a small radius from my house in Montgomery County, MD. I find them on Antenna Search.

**\* This proceeding requires a NEPA evaluation.**

*[Ref. - <http://www.ca6.uscourts.gov/opinions.pdf/10a0374p-06.pdf> Per No. 09-5761 **Heartwood, Inc., et al. v. Agpaoa, et al.** there is standing to challenge the current exposure guidelines because you have suffered an 'injury in fact' that is concrete and particularized; is actual or imminent; is traceable to wireless exposure; and that it is likely that this injury will be redressed by lower exposure guidelines.]*

**\* Re-fund the EPA's non-ionizing radiation protection research program for developing safe RF/MW exposure guidelines. The FCC cannot both promote wireless technologies and regulate RF/MW radiation. Since the FCC is not a health agency, it does not have the expertise to evaluate the science on RF/MW exposure.**

**\* Stop facilitating, encouraging, and supporting the rapid expansion of WiFi and other wireless exposures. This results in involuntary exposure to RF/MW. Research shows that it is biologically harmful to humans and other living beings.**

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