

Federal Communications Commission  
ET Docket No. 13-84  
August 2013

**Comments on Notice of Inquiry regarding Reassessment of  
Exposure to Radiofrequency Electromagnetic Fields  
Limits and Policies**

Dear FCC,

The current limits on RF exposures are not protective of the public health, especially not for children and other vulnerable populations.

The existing limits were enacted in 1996. Much has changed since, which renders them obsolete. Children use wireless devices for many hours each day, some even sleep with their Smartphone under their pillow. Various types of wireless transmitters are ubiquitous, so the entire population is irradiated 24/7.

The Telecommunications Act of 1996 (section 704) expressly forbids communities from siting transmission towers based on health precautions. Telephone companies have started to remove their landlines in some areas, forcing people to use cell phones and wireless internet service. Many schools require wireless tablets in their classrooms. People no longer have a choice whether they wish to be irradiated or not.

The FCC will need to enact new limits for today's environment, limits that protect the most vulnerable populations and take into account that the irradiation is involuntary. Given the involuntary exposures, the limits must work for everybody and must be conservative enough to account for any doubt. The existing standards fail on all accounts.

Much research published in the past twenty years clearly suggests the current limits are based on an obsolete model, and are much too high.

The potential cost to society in terms of lost productivity, lost educational opportunity and direct health expenses is enormous.

Further delaying lowering the limits will also increase the cost of the technical measures needed, costs that may become so large that they must be borne by the public.

The FCC should not repeat the mistakes of the past, where special interests kept delaying regulatory action by lobbying efforts and fabricating doubt. Well known examples include tobacco, leaded gasoline and asbestos.

The health effects of asbestos were well known in the 1930s, but the industry was able to delay action until the 1970s. The cost of renovating all the buildings containing asbestos built during those decades was enormous — a cost borne by others than the asbestos industry, which saw no downside to their delaying tactics.

History will continue to repeat itself, unless the FCC frees itself from special interest influence, looks very skeptically at “research” funded by special interests, and lets any doubt benefit the public health.

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### **Documentation of industry influence upon health effect research**

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*The Real Junk Science of EMFs: Stop Electric Field Cancer Research, Say Industry Scientists*, Microwave News, November 2009.

*IARC Drops Anders Ahlbom from RF-Cancer Panel*, Microwave News, May 2011.

*Disconnect*, (book), Devra Davis, Penguin/Dutton, 2012.

*Doubt is Their Product*, (book), David Michaels, Oxford University Press, 2008.

*Asbestos: Medical and Legal Aspects*, (book), Barry L. Castleman, Aspen Law and Business, 1996.