

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
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Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies)	ET Docket No. 13-84
)	
Proposed Changes in the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields)	ET Docket No. 03-137
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To: Office of the Secretary
Federal Communications Commission
Washington, DC 20554

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August 31 , 2013

Comment Submitted by David Adams:

Dr. Ronald M Powell, PhD in applied physics from Harvard University has written: **Biological Effects from RF Radiation at Low-Intensity Exposure, based on the BioInitiative 2012 Report, and the Implications for Smart Meters and Smart Appliances:** <http://emfsafetynetwork.org/wp-content/uploads/2013/08/Biological-Effects-From-RF-Radiation-and-Implications-for-Smart-Meters-June-5-2013-2.pdf>

Dr. Powell's Biological Effects Chart was produced from a review of the medical research literature on the biological effects of electromagnetic fields (BioInitiative.org). He concludes the following five points:

1. The current FCC Maximum Permitted Exposure (MPE) limits are so high that they provide no protection for the public from the biological effects found in any of the 67 studies.
2. New biologically based RF exposure limits proposed in the BioInitiative 2012 Report are 1 million times lower than current FCC limits and would protect against the biological effects found in nearly all of the 67 studies.
3. A single Smart Meter on a home can produce RF exposure levels that caused the biological effects found in either most or many of the 67 studies, depending on the distance from the Smart Meter.
4. A single Smart Appliance in the home can produce RF exposure levels that caused the biological effects found in nearly half or fewer of the 67 studies, depending on the distance from the Smart Appliance. Multiple Smart Appliances in a home multiply the total exposure.
5. A single Smart Meter on a nearest neighbor's home can produce RF exposure levels that caused the biological effects found in many of the 67 studies. A given home may have one to eight nearest neighbors, each with a Smart Meter, multiplying the total exposure in the given home.

This, he concludes, "Smart Meters are a community concern, not just an individual concern." The section on neighbors' meters, and how smart meters are a community concern is especially relevant as policy makers decide how to proceed with solutions. Here's a brief excerpt from his paper:

"A Single Smart Meter on a Neighbor's Home Can Produce RF Power Density Levels Shown to Cause Biological Effects

For some locations in a given home, the distance to a neighbor's Smart Meter may be less than the distance to the resident's own Smart Meter. Thus, a neighbor's Smart Meter may be the principal source of radiation for some locations in the given home. The Biological Effects Chart shows that a single Smart Meter can produce RF power densities found to cause biological effects even at distances greater than 20 meters, and certainly up to 100 meters. And the number of neighbors within that range can be large.

There is no substitute for a roll back of all Smart Meters at the community level, or higher."