

FCC 13-39

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

In the Matter of)	
)	
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
)	
)	

To: Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Comment Filed by: Rachel Cooper
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September 3, 2013

AFFIDAVIT OF L. RACHEL COOPER

State of New York]

New York County]

I, L. Rachel Cooper, attest that my statements are true to the best of my knowledge.

Comment round for FCC ET Docket No. 013-84 and ET Docket No. 03-137

1. My name is L. Rachel Cooper. My address is 93 Bedford Street, Ste. 5D, New York, NY 10014.

2. I am an independent health writer and internet consultant.

3. Re: New and Emerging Science. Present allowable levels or limitations on all Radio Frequency or RF/MW energy radiation, including low frequency RF/MW radiation, need to be drastically revised and lowered based on emerging science. Current "science-based" RF limits are based on thermal effects only (tissue heating) whereas new and emerging science shows significant adverse biological from exposure at or below current RF allowable limits. "[Current] Public safety standards are 1,000 – 10,000 or more times higher than levels now commonly reported in mobile phone base station studies to cause bioeffects." The complete Bioinitiatives Report 2012 can be downloaded from the internet from <http://www.bioinitiative.org/>. The pdf exceeded the public comment upload limits.

In order for the FCC to fulfill its Congressional mandate to protect the public health and safety from harm, it must review and lower its RF safety regulations. Lack of agreement between scientists as to the biological effects of RF exposure, is not an excuse for regulatory inaction or the continuance of outdated safety limits that are based on an incomplete review of the science. The FCC has an affirmative duty to consider all relevant facts and to ensure that the record is complete. Any review that excludes peer-reviewed scientific studies that contradict the existing regulatory limits or scientific standards is not a complete review.

4. Precautionary Principle. The FCC has a duty to the public to protect the public health and safety from harm from radiofrequency radiation. The precautionary principle is an accepted principle of international regulation and should be applied in this case. The precautionary

principle calls for taking action to protect human and environmental health in the face of uncertain risks and holds that, where an activity threatens human health or environmental harm, precautionary measures should be taken even in the absence of full scientific certainty.

Present allowable levels or limitations on all Radio Frequency or RF/MW energy radiation, including low frequency RF/MW radiation, need to be drastically revised and lowered based on the precautionary principle. In addition, increased regulation regarding the location and installation parameters of RF base stations are needed to protect the public, especially children, the elderly, and the infirm, etc. from uncertain environmental and health risks.

The FCC should revise the United States limits in accordance with the most precautionary safety limits of other developed nations, such as Switzerland, Italy, China, and Russia. See attached document entitled RF_country_comparison.pdf.

5. The health risks associated with cumulative exposure levels from the exponential proliferation of wireless technology use throughout the United States can not be ignored in this review. Standards can not remain the same or be raised because wireless technology use is increasing and therefore exposure levels are clearly increasing. Cumulative effects of wireless radio frequency devices must be considered in this assessment. Furthermore, unregulated devices are coming on the market which are testing as greatly exceeding our already excessively high safety standards. See attached document entitled RF_Assess_Health_Smart_Meters.pdf.

6. FCC is not a health organization and does not possess the expertise or resources to assess the costs of the risks to public health that are associated with or caused by radio frequency EMF exposures. FCC needs to make a direct request to the EPA to use its taxpayer-funded resources, including experts present at its National Risk Management Research Laboratory, to conduct all of the risk assessment and cost analyses necessary for this proceeding. I thereby request that the FCC ask the EPA to lower allowable levels and to restrict the applications and locations of radio frequency radiation according to the precautionary principle and new science.

I ask that a moratorium be placed on the sales of new spectrum, transmitting utility meter installation, and installation of additional base stations for wireless service to be in effect

during the time that new precautionary and biologically-based safety limits are being developed and put into place.

7. As the roll-out of RF microwave Smart Meters for utilities has been increasing since 2008, I see huge numbers of people reporting new serious health problems for which they did not have pre-existing conditions or previous diagnostic or treatment histories. In many cases, these people's doctors are confounded and say that their conditions are atypical, particularly for their age and/or lifestyle (diet, exercise, etc.). I admit that I am speaking in general terms here, however, as a health writer, I am sounding the alarm. I am seeing an astounding increase in disease related to inflammatory, heart, neuroendocrine and immunological diseases. [Additional Note: Please note that a Smart Grid does not have to be wireless and that Italy's Smart Grid is all wired with fiber optics. It is not necessary for Americans to use wireless Smart Meters).

I respectfully remind the FCC that it has a duty as clarified by legal precedent set by *Scenic Hudson v. Federal Power Commission* to create a complete record and to seriously consider the comments of all members of the public so as to fulfill its obligation to represent the public interest.

Respectfully submitted by
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September 3, 2013