

Comments on Notice of Inquiry, ET Docket No. 13-84

Summary

* Smart Meters represent a serious risk to public health, are a fire hazard, and enable privacy and civil liberties violations that are currently not possible with analog metering infrastructure.

* Thousands of people have reported health impacts from smart meter pulsed radiation.

1. Thank you for the opportunity to submit testimony related to the FCC's review of RF exposure guidelines for humans.

2. Stop Smart Meters! is a California based, international organization dedicated to raising awareness about the risks, violations, and safety problems related to "smart" utility meters.

3. I founded Stop Smart Meters! in mid 2010 as Northern California's Pacific Gas & Electric began to deploy untested gas and electricity meters throughout their 10 million household "service territory." We are a grassroots funded organization, beholden to no one besides the public's interest in these matters. Immediately in areas and neighbourhoods that had been "deployed" we received reports of blatant overcharges, fires, explosions, electrical problems, as well as a consistent pattern of health problems being reported by a diverse sample of the population spread across the impacted areas.

4. A consistent set of symptoms have been reported over the past three years from people throughout these "smart grid" deployed areas. These symptoms—such as headache, nausea, dizziness, heart palpitations, etc. are consistent with past reports and scientific studies of "radio wave" or microwave sickness among both military personnel and civilians exposed to this form of radiation.

5. It is important to be aware that those pushing smart meters—in both industry and government—are misrepresenting the radiation levels and human exposure totals from "smart" meter mesh networks with respect to other commonly used wireless devices, by using "time-averaging" to disguise the powerful spikes emitted by these devices. In fact, significant and far higher exposures (both instantaneous as well as cumulative) can result from "smart" meters than from many wireless personal devices (that we can- needless to say- choose to shut off in any case).

6. Claiming that "smart meters" emit far less radiation than a cell phone is like saying that a strobe light emits less light than a candle. While perhaps technically

true if you “time average” the brief spikes of the strobe with the constant glow of the candle, the instantaneous impact of the strobe is far more powerful than the candle, if stored up and released in a millisecond, as occurs with the capacitors within “smart” meters.

7. Daniel Hirsch, Nuclear Policy Lecturer at the University of California conducted an independent analysis of smart meter emissions and concluded that in a number of possible exposure and proximity scenarios, smart meters exceed cumulative whole body dosage compared to a typical mobile device user. Smart meters were calculated to expose some residents to more than 100 times the cumulative radiation someone might typically receive from their mobile.¹

8. Most “smart” meters from such common manufacturers such as GE, Landis & Gyr, Itron and Sensus emit pulsed spikes of microwave radiation approximately every five–10 seconds or more, 24 hours per day. Pacific Gas and Electric admitted to the California Public Utilities Commission that their electric smart meters can emit “up to 190,000” microwave pulses per day.² Introducing a device that emits this number of radiation spikes directly into the living environments of millions of residents while such comprehensive records of health problems exist and the World Health Organization has classed such radiation a Class 2B carcinogen,³ can surely be classed as certifiably insane.

9. Despite a Federal Communications Commission (FCC) requirement (itself based on outdated, thermally based damage assessments and guidelines) that no person shall get closer than 20cm to the meters being installed in and on people’s homes, that the meters not be deployed in banks (such as in apartment buildings and nursing homes), and installed only by professionals, these already weak regulations have been violated thousands of times and numerous injuries can be cited as a result. Presently in the US at least, no warnings related to these regulations are posted by the utility, the local, state, or federal government. People have had to discover the hard way to stay away from these unwelcome devices forced upon their home.

10. Over the past three years, more than 1400 individuals have submitted health related complaints to our organization following smart meter installation. Many were unaware that a smart meter had in fact been installed, and only connected the symptoms to the presence of the meter in some cases many months after installation. This fact refutes the claim that the many thousands of people reporting health harm are somehow suffering from a “psychosomatic” disorder. Far more than 10,000 health-related complaints (the CPUC refuses to give us the actual number, or the contents of such complaints) have been submitted to the CA Public Utilities Commission, including from MD’s, psychotherapists, nurses who have testified directly to the CPUC regarding their own health problems related to the meters. Sadly, very little has been done to even investigate the many reported ill effects to the public’s health.

11. The testimonials we submitted⁵ to the Maine Public Utilities Commission as part of their inquiry into the health problems associated with smart meters demonstrate the devastating effects of this technology. (These declarations can be viewed at <http://www.mainecoalitiontostopsmartmeters.org/wp-content/uploads/2013/01/Exhibit-11-Hart-Web.pdf>) Identities and addresses have been anonymized to protect the privacy of those involved, but the contents demonstrate evidence of a wide variety of health and environmental problems related to smart meters. Many of the victims are willing to be public. Particularly notable is the testimony of Dr. Toril Jelter, a paediatrician from Walnut Creek, CA who assesses and treats many autistic children and sees a notable worsening when her patients are exposed to certain forms of wireless technology including smart meters. She herself has suffered the effects of smart meter deployment in her neighbourhood, as her testimony on page 29 of the submitted declaration set⁶ illustrates.

12. Because of the sheer volume of smart meter health related complaints, the California Department of Public Health created a separate e-mail address to receive them (SmartMeter@cdph.ca.gov) and a special link on their contact page (<http://www.cdph.ca.gov/services/contact/Pages/default.aspx>) to guide people who were reporting ill effects. Despite this, little to nothing of substance has been done on a policy level to address these problems.

13. Another major health and safety issue related to smart meters is that of fire. Fires related to faulty or incorrectly installed smart meters have been responsible for loss of life as well as millions in fire damages to homes and businesses. Often the utilities seek to settle with the victims quietly and avoid public attention. Though in several US states there have been inquiries into fire damage caused by smart meters.⁷

14. The smart meter installations and smart grid networks being imposed on local governments and communities around the world have opened up a Pandora's box of new health and environmental problems, privacy violations, civil liberties erosions, as well as national security implications if one considers society's current dependence on centralized utility services. Why spend millions to create such problems when standard, reliable analog meters have been operating for decades, while creating jobs and sustaining a personal connection between utility customers and the company that is meant to serve them- a connection that smart meter networks now eliminate. Such personal connection can be critical. Who is to say that the town of San Bruno, CA which suffered a blast from a gas pipeline maintained in a hazardous manner by PG&E, that killed eight people and razed an entire neighbourhood would have been spared the human tragedy if utility personnel in the neighbourhood had been present and smelled the leak? (San Bruno was fully deployed with smart meters at the time of the explosion and thus no meter readers were walking neighborhoods).

15. Smart meters are not green, and they are not a real solution to climate change. The terabytes of data that the meters generate require the construction of football fields of data centres, and the meters and associated infrastructure consume not an insignificant amount of grid electricity themselves, all fuelling demand for more electricity and emitting more carbon.

16. The “smart” grid is a bad choice for the US and is money wasted that could be spent on worthwhile solutions to carbon dependence. People need better information about their energy usage but the smart meter has not delivered tangible benefits in the area of customer awareness. Simpler, cheaper, wired devices combined with local and home based renewable energy generation is the path forward, and is on the verge of becoming an alternative to residential grid electricity services altogether, much to the dismay of electricity companies.

17. Thank you again for the opportunity to comment on the FCC’s proceeding on RF safety. We urge tough questions be asked about the appropriateness of existing levels. There is only one way to adjust these levels and that is downward. Technological innovation is crucial but we must do it in a way that puts human health, safety, and welfare first, rather than last.

Sept. 3, 2013

1 http://www.committeetobridgethegap.org/pdf/110212_RFrad_comments.pdf

2 <http://blog.sfgate.com/energy/2011/11/03/smartmeters-send-almost-10000-signals-a-day/>

3 http://www.iarc.fr/en/media-centre/pr/2011/pdfs/pr208_E.pdf

4 <http://www.mainecoalitiontostopsmartmeters.org/wp-content/uploads/2013/01/Exhibit-11-Hart-Web.pdf>
<http://www.mainecoalitiontostopsmartmeters.org/wp-content/uploads/2013/01/Exhibit-11-Hart-Web.pdf>

5 <http://www.mainecoalitiontostopsmartmeters.org/wp-content/uploads/2013/01/Exhibit-11-Hart-Web.pdf>

6 <http://www.mainecoalitiontostopsmartmeters.org/wp-content/uploads/2013/01/Exhibit-11-Hart-Web.pdf>

7 <http://www.myfoxdc.com/story/22240644/fox-5-investigates-smart-meters-spark-controversy#axzz2U3zZzzOM>