

**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
)	
)	

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

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I wish to submit a further comment.

1 The **NYS Public Service Commission** recently sent me copies of 3 documents pertinent to their program of digital utility metering in New York State:

1. The FCC OET Bulletin 56, Fourth Edition, August 1999, Authors Robert F. Cleveland, Jr. and Jerry L. Ulcek, “Questions and Answers about Biological Effects and Potential Hazards of Radiofrequency Electromagnetic Fields;”
2. The article “No Health Threat From Smart Meters” from the fourth quarter 2010 Utilities Telecom Council journal, UTC; and
3. The Electric Power Research Institute, EPRI, article of February 2010, “A Perspective on Radio-Frequency Exposure Associated With Residential Automatic Meter Reading Technology.”

2 In these articles, I am given to understand that the FCC’s current limits on exposures to RF radiation are based on the amounts needed to heat body tissues sufficiently to cause rats to change their behavior. The UTC article states that radio frequencies “emitted by smart meters, cell phones, wireless routers...can only damage the body at extremely high levels.” **Recent science shows this assumption is far off the mark.** Extremely low levels are bio-active and many effects stem directly from the pulsing nature of wireless RF radiations.

3 The **BIOINITIATIVE REPORT OF 2012**¹ peer-review of over 1800 new studies urges an immediate international limit of no more than .03 **milliWatts per meter squared**², because biological effects are seen at levels at least this low. The **AUSTRIAN MEDICAL ASSOCIATION**³ has issued guidelines which set the limit far lower than that, at .001mW/m². Please see their document of March 3, 2012, [Guideline of the Austrian Medical Association - Freiburger Appell](#) (Consensus paper of the **Austrian Medical Association's EMF ...diagnosis** and potential **treatment** of unspecific stress-related health problems.) See pp. 9-10 for their limits and ranges for both RF radiation and electromagnetic fields (EMFs). We must pay attention.

4 More and more people ARE becoming electrohypersensitive, experiencing a wide range of symptoms brought on by chronic and exponentially increased exposures to RF radiation and EMFs - headaches, etc., and even now a Type 3 Diabetes. All three documents, listed above, convey grossly out-dated material on the biological effects of RF and electrical transmissions and fields.

5 The FCC OET Bulletin 56 of August 1999 cites that “*two areas of the body, **the eyes and the testes**, are known to be particularly vulnerable to heating by RF energy because of the relative lack of available blood flow to dissipate the excessive heat load.... Temporary sterility, caused by such effects as **changes in sperm count and mobility** is possible.*” It also states that “*although not commonly observed [in 1999], a microwave ‘hearing’ effect has been shown to occur under certain very specific conditions of frequency, signal modulation, and intensity where animals and humans may perceive an RF signal as a **buzzing or clicking sound**. Although a number of theories have been advanced to explain this effect, the most widely-accepted hypothesis is that the microwave signal produces thermoelastic **pressure within the head** that is perceived as sound by the auditory apparatus within the ear. This effect is not recognized as a health hazard, and the conditions under which it might occur would rarely be encountered by members of the public.*”

6 But, regardless of the conclusions of the FCC in 1999, it must be fully respected that citizens, now in 2013, ARE experiencing exactly these nerve-wracking buzzings, tinnitus and pressures, in their homes and workplaces, on account of exposure to non-thermal, RF radiations from wireless devices (such as digital utility meters). We must not be forced to live with these conditions.

7 On p. 8, the article states that effects have been seen at “*relatively low levels of RF radiation. These reported effects have included certain changes in the **immune system, neurological effects, behavioral effects**, evidence for a link between microwave exposure and the action of certain drugs and compounds, a ‘**calcium efflux**’ effect in brain tissue (exposed under very specific conditions), and **effects on DNA.**” [my bold]*

8 → Please: I would have thought that in 1999, when confronted with these clear intimations of something going very wrong in our biologies on account of our readiness to expose ourselves to low level RF radiation such as this, the FCC would have taken a strongly precautionary stance, not the ‘monitor-the-evidence’ and ‘wait-and-see’ approach it did (as in the article) while opening the floodgates for RF radiation to saturate our entire biosphere in an “innocent until proven guilty” manner that applies ONLY to human beings, that does not belong to a technology that has never been a part of the natural process of life and could not be trusted to be compatible with it.

9 If you do not decrease the limits drastically, to where the **BIOINITIATIVE REPORT OF 2012** documents suggest, and better yet to the level urged by the Austrian Medical Association, it may be too late for us to assure our well-being and our reproductive viability into the future. **I understand that it is being seen that in just five generations of RF exposures such as ours, rats can’t reproduce.** And rat DNA does not differ from human DNA in its essential nature and vulnerability. We must pay attention.

10 And where will those of us who are children, elderly, frail or sensitive go to live when digital, wireless utility meters in HAN, NAN and WAN grids electrify our environs in all directions? This is not a time for saying, “let’s try it and wait and see.” We know enough to be able to say that if we do not retreat now, we are in terrible trouble. Who will tend all those who are increasingly born with ASD and those who succumb to brain cancers, other cancers, Alzheimer’s? And what about all the suffering from insomnia and heart a-rhythmias, ADHA, etc. All of this leads back to, are effects from far too much RF radiation, 24/7, unremittingly. The constant on/off pulsing of all wireless devices harasses cellular functions that depend on clear bioelectrical signals that regulate nerve, heart, hormone and immune system responses. We cannot avoid becoming sick from this sooner or later, because the effects are also cumulative, as in the case of cancers from it.

11 I discovered that the direct cause of the disquiet in my own chest, in my heartbeat, was the cordless phone base station and wireless router in my home emitting pulsing WiFi 24/7. Since silencing this WiFi, my heartbeat has settled down. I connect by ground phone and ground cables. The difference is night and day. *I am glad that I have that choice. Other places I go, I do not.*

12 In many cases, because the FCC limits are so astronomically high compared to the levels that are being verified to be bio-disruptive, the devices we use everyday often expose us to shockingly excessive amounts of RF radiation - not because they need to be so high, but because the FCC and the manufacturers simply regard these amounts of exposure as harmless. We are coming to know how very far from harmless they are, and how very true the earlier research was in its indications.

13 Using a **CORNET ED-78S RF/LF FIELD STRENGTH POWER METER** sensor I’ve found that many cordless phone, DECT, base stations emit pulsing WiFi constantly and in the range of up to 1827 mW/m² - mostly in the upper range. When the handset is activated it can deliver up to 1900 mW/m² **directly to the ear.** These DECTs are Verizon, Panasonic, and AT&T. The Motorola model I only briefly checked was emitting constant RF pulsing of at least 400 mWm².

However, some base stations are designed to be silent unless a handset is activated, at which time they emit at 1-13 mW/m² - still far too much but hugely less than the absolutely shocking 1800 of

these others I've mentioned. The silent ones happen to be RadioShack and VTech - which is not to say that all of their models 'shut up' between calls. When the handset is activated, the ear receives 3-17 mW/m², not the amounts up to 1900, where even at 3 feet away the exposures are unsafe in light of the recent research. I've seen the photographs of the adolescent rat brain as it looks normally on the surface and then as it looks after the equivalent of only two hours of talking on one of these DECT phones.⁴ The surface has lesions. Even 50 days later it is abnormal with lesions - no recovery in that time. No wonder we have blood-brain-boundary problems and such trouble with microorganisms that can too easily cross it, such as Lyme. We must pay attention.

14 EVERY wireless device must have on/off switches for the wireless function - none of this constant on with no off button. Regardless of lowered RF emissions limits, warnings must be placed on all such devices at point-of-purchase. None can be assumed safe. We need to know that we take into our hands both our lives and those of all generations to come within our family tree, in the event that we care about the longevity of our personal lineage if not our collective longevity.

15 **And herein is my sense of alarm about wireless meters in particular, upon which your proceedings bear: It is argued (in the articles I was sent by the NYS Public Service Commission) that metering contributes little to the RF we are exposed to. Not so. People can choose to frequent coffee shops or not, choose to hook up their computers and devices by WiFi, etc., or not, as they please. And they can choose not to when they understand how high the stakes are to their health. But meters are PERMANENT installations. Whatever their emissions are now with no 'grid', where they spike wireless radio frequencies at least 4-5x a minute 24/7 whether transmitting or not, these emissions will be on the increase. Each meter is to keep constant contact with "smart chips" in all household appliances and with up to a thousand neighboring meters. → All of this wireless pulsing must go through my dwelling, my workplace and through me, permanently. THIS IS TOXIC TRESPASS. I have the freedom to choose to remove wireless WiFi from within my home for health reasons. I will have no freedom and no control over this unremitting trespass from meters, and no escape from it.**

And it is being shown that near proximity to these devices causes trauma to the blood.⁵ This alone directly endangers the well-being of anyone doing work in the vicinity. We must pay attention.

16 Please drastically reduce the limits for RF radiations as urged in the BioInitiativeReport , mandate the total revamping of all existing devices and terminate all "SmartGrid" plans.

Sincerely,

Kate Reese Hurd

¹ BioInitiative Report of 2012, Conclusions Section: <http://www.bioinitiative.org/conclusions/> In the Report itself see "Section 22: Precaution in Action - Global Public Health" for the **International Advisories** (<http://www.bioinitiative.org/>). We must pay attention.

² .03 mW/m² = .003 uW/cm² as in the Report (i.e .03 **milliWatts/meter**² = .003 **microWatts/centimeter**².)

³ Austrian Medical Association - Google "Guideline of the Austrian Medical Association" for the diagnosis and treatment of EMF- related health problems and illnesses (EMF syndrome). Link is above, in the text.

⁴ See the presentation of Dr. Karl Maret, M.D. and BioMedical Engineer in the YouTube which is not only about so-called "Smart" meters: <http://www.youtube.com/watch?v=p-nmaYU6kek&list=PL63B0143B3C354D88> "The Truth About Smart Meters" Sept 15, 2010. CTVsantacruz Freedom Forum 1:53:42. Also see another YouTube on RF technology and what has been known of the terrible health effects of it: <http://www.youtube.com/watch?v=v4HsxNG2-4M> Brian Thiesen CSTinBC Aug 15, 2012 1:08:15- "The Truth about Smart Meters" - meters being just the most present and egregious form of RF, now flooding the biosphere.

⁵ <http://www.youtube.com/watch?v=y4JDEspdx58> "Live Blood Analysis - Observable Effects of RF/MW Radiation via Smart Meters"