

**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
	)	

**REPLY COMMENTS OF THE NATIONAL ASSOCIATION OF  
TELECOMMUNICATIONS OFFICERS AND ADVISORS**

The National Association of Telecommunications Officers and Advisors (“NATOA”)<sup>1</sup> submits these reply comments in response to the Notice of Inquiry (“NOI”),<sup>2</sup> released March 19, 2013, in the above-entitled proceedings to emphasize our stance that the Commission should undertake a comprehensive review of its RF emissions rules and work to provide timely updates in light of the best, *independent* scientific research from around the world.

Our position is not based on any belief that the current standards are obsolete, too strict, or too lenient. Rather, our position is based on the fact that the current rules have been in place

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<sup>1</sup> NATOA is a national trade association that promotes local government interests in communications and serves as a resource for local officials as they seek to promote communications infrastructure development.

<sup>2</sup> See *In the Matter of Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Proposed Changes in the Commission’s Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields*, First Report and Order, Further Notice of Proposed Rulemaking and Notice of Inquiry, ET Docket Nos. 13-84 and 03-137 (rel. Mar. 29, 2013) (“NOI”).

for nearly two decades, adopted “at a time when cell phone use by children was rare, smart phones did not exist, cell phone cases were virtually unheard of, and the FCC assumed consumers would use belt clips or holsters to carry their phones.”<sup>3</sup>

NATOA is especially concerned with comments filed by the Environmental Working Group (“EGW”) that assert “children are more vulnerable to potentially harmful RF emissions from cell phones” than adults<sup>4</sup> and by those filed by the Pong Research Corporation (“Pong”) that state “children absorb materially more electro-magnetic radiation (“EMR”) than adults.”<sup>5</sup> Local government officials are often faced with similar positions voiced by concerned parents at public hearings dealing with the siting of new wireless facilities. While NATOA cannot independently attest to the scientific veracity of these comments, it is hoped a comprehensive review of the current RF rules would provide consumers and others with the information they need to make educated consumer choices. Such a review may not alleviate all consumer concerns, but it would go a long way in providing badly needed assistance to local government officials when faced with questions regarding RF emissions and public health and safety.

Respectfully submitted,



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<sup>3</sup> City and County of San Francisco Comments at 4.

<sup>4</sup> Environmental Working Group Comments at 3.

<sup>5</sup> Pong Research Corporation Comments at 8.