

**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 CITY OF PORTLAND, OREGON ON THE
REASSESSMENT OF FEDERAL COMMUNICATIONS COMMISSION
RADIOFREQUENCY EXPOSURE LIMITS AND POLICIES**

I. INTRODUCTION

The City of Portland, Oregon (“Portland”) submits these reply comments in response to comments previously submitted in the Notice of Proposed Rulemaking (“NPRM”) and Notice of Inquiry (“NOI”), released March 29, 2013, in the above-entitled proceedings.

Portland agrees with the comments offered by the Town of Hillsborough, California that the FCC should address the RF emissions standards in “clear English, understandable to the citizens who will be affected”.¹ Many citizens who participate in wireless tower land use proceedings in Portland raise questions regarding the effects of RF emissions. In Portland, these citizens often cite the “precautionary principal”:

[O]pposition to the siting of the cell tower [is] based on “The Precautionary Principle” which states: “*When an activity raises threats of harm to human health*

¹ Comments of City Manager Randy Schwartz, September 3, 2013.

or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically.” The evidence points to the potential for serious public health consequences with the widespread use of and exposure to such emissions.²
(emphasis original)

The concerns raised by these citizens manifest the current disconnect between the extent of wireless technology in today’s world, and the lagging state of the FCC’s examination of potential health impacts. As noted by the City and County of San Francisco, California, the Commission’s laxity in “not undertak[ing] a comprehensive review of [the current RF] standards for nearly two decades is disconcerting to many consumers[.]”³

The City of Portland also supports the comments filed by NATOA in this proceeding regarding concerns raised at the local level by parents questioning the long-term health effects of RF emissions on children. NATOA appropriately identified that the FCC should undertake a comprehensive review of current RF emissions standards to address the significant level of distrust that is circulating among the public across the nation at local levels. Portland shares NATOA’s position that this can only be addressed if the FCC undertakes an evaluation of the RF emissions standards in light of the best, independent scientific research from around the world.

The City of Portland also supports the reply comments of the City of Boston, Massachusetts. The Commission should require that wireless providers co-locating at a single site should employ a single method for determining the RF emissions in

² See, e.g., E-mail to Commissioner Fritz from Mari Anne Gest, Oregon Center for Environmental Health, *Opposition to cell phone tower/pole at 37th and Fremont* (February 11, 2010); E-mail from Barry F. Anderson to Portland City Council, *Cell Phone Transmitter Tower Installation* (December 10, 2008). See, also, Amanda Waldroupe, “Portland Turns Down Moratorium on Utility Poles”, *The Lund Report* (November 17, 2010)
http://www.thelundreport.org/resource/portland_turns_down_moratorium_on_utility_poles.

³ Reply Comments of the City and County of San Francisco, p. 3 (November 1, 2013).

combination, so that differing methods produce do not produce skewed results. We also join with Boston in urging that the Commission adopt its proposal to “consistently require either disclosure of the maximum SAR value or other more reliable exposure data in a standard format, perhaps in manuals, at point-of-sale, or on a website.”

Respectfully submitted this 18th day of November, 2013,

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