ET Docket No. 13-84

January 31, 2014

Federal Communications Commission
Washington, D.C. 20554

RE: Final Reply to Comments Regarding Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies, Proceeding 13-84

To whom it may concern:

Again, thank you for taking late comments and replies to public comments and reconsidering the current FCC limits for microwave radiation, aka 'radiofrequency'. I have come across new information, new presentations and papers that need to be included in the FCC's discussion for reconsidering the current existing FCC's RFR transmission standards as stated in Proceeding 13-84.

I am urging the FCC Commission to lower current RFR transmission standards because they are already dangerously high. The FCC Commission has erroneously based its current RFR Transmission standards upon the findings from IEEE and the NCRP or also known as INCIRP 2010.

I object to the IEEE and NCRP's authority because most of the individuals in these standards committees are not MD's, they have no biological training most of them, they are electrical engineers, they are computer scientists, and thus they know NOTHING about the biological impact of how non-thermal wireless radiation does and can adversely affect human health. If we are so concerned with making profits at the cost of destroying the health of others, there is something gravely wrong with what we are doing and by implication, the FCC, the IEEE, the NCRP/INCIRP.

For that reason, I am submitting a 28 page December 2013 newsletter by the Electrosensitivity charity of the United Kingdom (ES-UK), and also have copied and pasted their critique about standard setting organizations, IEEE and ICNIRP who apparently are against continued studies and research into how ELF (extremely low frequency) causes adverse health effects.

Also, there was a brilliant recent presentation at the Commonwealth Club of San Francisco about the tremendous adverse health problems caused by smartmeters from Jan 28th, 2013 by Dr. Karl Maret, I am uploading his slide presentation as an attachment. He highlighted that the utility companies such as Pacific Gas and Electric did NO long term testing whatsoever of smart meters before rolling them out, and that people's health is being permanently damaged from this full body exposure because there is no way to turn off one's neighbor's smartmeters even if one choose to opt out since smartmeters are known to emit radiation up to 300 feet and pulse up to 190,000 times/day.

I recommend that the FCC seek guidelines from not just engineering standards committees but to get advice from doctors, health care practitioners, and those people who are already injured from continued exposure to wireless radiation. There is a huge problem here with continuing to deny that there are no adverse health problems caused by NON-THERMAL wireless radiation. If the current standards remain unchanged, or worse, are further increased to make the wireless industry happy, you will be seeing an explosion of cancers, brain tumours and a shortening of life expectancy. I predict that if RFR standards aren't lowered soon, many people will be dying in their 40s and 50s instead of in their 70s and 80s.

What is truly shocking and depressing is that the standards committees like IEEE and NCRP/INCIRP don't even recognize that electrosensivity, ES, actually exists. It's just not in their vocabulary. More and more people are becoming ES or EHS (electromagnetic hyper sensitive), which these standard committees are completely ignorant about. Please FCC Chairman Wheeler, while wireless devices can be wonderful, the biological adverse health effects are not fun. Please consider that the current explosion of wireless devices will result in an epidemic of tragic health problems for all, birth defects passed on to future generations, and behavioral problems in young children.

From pages 23 thru 25 of ES-UK, Dec 2013 newsletter

CRITICISMS OF PHE's AGNIR AND ICNIRP

"Voodoo science": a member of PHE's AGNIR criticized yet again: ants have not "watched the TV news"

In the ES-UK September 2013 Newsletter there was a report of the stringent criticisms by Prof. Dariusz Leszczynski of Dr Rubin, a member of Public Health England's Advisory Group on Non-Ionising Radiation, the people responsible for the very high level of radio exposure in the UK according to the Rt Hon Jeremy Hunt MP, the secretary of state for health. Prof. Leszczynski criticized Rubin for using "Voodoo science" and "pseudo science" to claim that ES is purely psychological. This followed Prof. Andrew Marino's criticism, in the International Journal of Neuroscience, of Rubin's refusal to accept the non-linear implications of the 2011 study by McCarty. Yet another study, this time on how ants react to EM exposure, criticises Rubin's controversial psychological hypothesis: "Finally, one very elegant feature of using ants as experimental animals is – as for other animal species, plants and bacteria - that they do not lend themselves to psychological explanatory models, such as mass media-driven psychoses (Witthoft and Rubin, 2013). If they react to artificial EM fields, it is not because they have listened to radio broadcasts, watched the TV news, or read columns in tabloids. No, then they do react to the actual adverse environmental exposure." (Cammaerts and Johansson, "Ants can be used as bio-indicators to reveal biological effects of EM waves from some wireless apparatus", Electro Biol Med., 2013).

PHE/AGNIR against the World Health Organisation

PHE and AGNIR, in supporting Rubin's flawed and controversial psychological hypothesis for ES, appear to repudiate the WHO Environmental Health Criteria no. 238 (2007) on ELF and Health, p.136: "These symptoms are not explained by any known medical, psychiatric or psychological disorder."

PHE's AGNIR member wants to halt to ELF research on breast cancer; scientists disagree

Maria Feychting, a member of PHE's AGNIR, which is responsible for high levels of radiation in the UK, and thus for ES, according to the Health Secretary, Jeremy Hunt, wants to stop wasting money on any more epidemiological studies of breast cancer risks from power-frequency EMFs (ELF). In an invited commentary in the American Journal of Epidemiology she wrote: "We can be confident that exposure to ELF magnetic fields does not cause breast cancer." This was prompted by the failure of a study among Chinese textile workers to find an association between breast cancer and ELF EMF. This would challenge the effects of ELF which, like light at night, reduces the anti-oxidant melatonin produced at night by the pineal gland, as first proposed in 1987 by Richard Stevens.

Stevens referred to work by L□scher in Germany, showing from 1993 that ELF EMFs play a role in the formation of breast cancer tumours. But, as Microwave News reported on 1st February 2004, Gary Boorman of the USA's NIEHS, "began a dirty tricks campaign to discredit L□scher." In 2004 L□scher showed how different strains of rats with different genetic susceptibility gave different results. L□scher's work is important since, if he is correct and EMFs promote breast cancer, "his animal data would support the epidemiological association linking EMFs to cancer and bump up the classification of EMFs from a possible to a probable human carcinogen", from 2B to 2A. In fact international scientists would now classify EMFs as class 1 certain, according to the BioIniative Report 2012. Sobel, who first linked ELF and Alzheimer's in seamstresses in 1994, said: "There's strong evidence that low levels of melatonin are a risk factor for breast cancer and relatively moderate magnetic fields affect circulating melatonin. It is very likely that there is a link between magnetic fields and breast cancer." Sobel noted that Hutchinson's study included the entire history of the women's exposures, but "What happens early in life may not be as important as what happens later in life." Sam Milham, the first to link EMF and leukaemia in 1982, said "Whatever causes male breast cancer causes female breast cancer." Male breast tumours are thus a sentinel cancer for EMF exposure, just as mesothelioma is for asbestos, as evident in a meta-analysis of 18 studies showing an association between EMF and male breast cancer (Sun J-W et al, Asian Pac J Cancer Prev., 2013). Milham believes that exposure assessment should measure high-frequency transients and harmonics; the Hutchinson meter does not pick up signals over 800 Hz.

PHE's AGNIR and conflicts of interest

Mona Nilsson, the Swedish journalist who pointed out Anders Ahlbom's incomplete disclosure of potential conflicts of interest (COI) which led to his withdrawal from the IARC panel in 2011, is now asking the editors at the American Journal of Epidemiology whether Maria Feychting, a member of PHE's AGNIR, neglected to disclose her own potential conflicts in her COI statement for her new commentary, according to Microwave News on 26th September. At the end of the paper Feychting wrote: "Conflict of interest: none declared." Nilsson is circulating a COI statement filed by Feychting on 30th March 2012 where she included: co-investigator of "EMF and childhood leukemia survival – a pooled analysis" funded by the Electric Power Research Institute (EPRI). EPRI is the electric utility industry group where where Kheifets used to work full time and is now a consultant. "Over the years, few organizations have done more to derail and obfuscate EMF research than EPRI." (MN) In addition to PHE's AGNIR and ICNIRP, she is also a member of ICL's Airwave steering group, the WHO's core group for a RF risks monograph, co-investigator, with Ahlbom as principal investigator in Sweden, of COSMOS which is funded in part ultimately by TeliaSonera, Ericsson AB and Telenor.

In 2011 Feychting listed funding from also the Mobile Manufacturers Forum, the GSM Association, and the Mobile Telecommunications Health and Research Programme.

PHE's AGNIR as part of the pro-industry pressure-group ICNIRP

"Does ICNIRP Speak for Public Health?" is the heading for a report by Microwave News of 6th July 2011, updated 25th September 2013. "The controversy over whether cell phones lead to tumors is not some intellectual exercise like counting angels on the head of a pin. It's about public health, and you can't get more "public" than when you're talking about the health of 4-5 billion users of cell phones." The report then gives "the facts": 3 different types of tumours have been linked to long-term users of mobile phones and 2 independent groups have documented associations with glioma and acoustic neuroma. Microwave News asks whether two members of PHE's AGNIR, Feychting and Swerdlow, along with other ICNIRP epidemiologists, are "really so sure that they are right that they are willing to throw out all the studies including their own [Interphone]?"

(PHE) NRPB: "instructed not to admit to any adverse effects"

Dr Mike Clark, a spokesperson for NRPB (now PHE/HPA), apparently said of the health damage from mobile phones: "We are instructed not to admit to any adverse effects", according to evidence to the House of Commons Science & Technology committee in 1999 (Appendix 6: Powerwatch Memorandum, 3.13:
www.publications.parliament.uk/pa/cm199899/cmselect/cmsctech/489/489a11.htm)

"Voodoo Science" from ICNIRP's Croft as well as PHE's AGNIR's Rubin

The psychologist Rodney Croft, from the University of Wollongong's School of Psychology, in 2012 joined the private pro-industry pressure-group ICNIRP (International Commission on Non-Ionising Radiation). He is also director of the Australian Centre for Electromagnetic Bioeffects Research. On 24th August he was quoted by the Illawarra Mercury as making the extraordinary claim about the well known harm from mobile phones, where the radiation was classified by the World Health Organisation's IARC in 2011 as a 2B cancer agent: "There's a pretty strong consensus that there's not a problem in adults." Croft's claim has been called "Voodoo Science comments" by Prof. Dariusz Leszczynski, a member of IARC and a leading expert in this field, who stated on 28th September: "There is absolutely no consensus among the scientists", except perhaps for "a pre-selected private club called ICNIRP". Prof. Leszczynski has also called the failed psychological studies by the psychologist Rubin, a member of the pro-industry group AGNIR run by the UK's PHE, "Voodoo Science" and "pseudo science".

The ICNIRP may be wrong: "Stop following what ICNIRP says"

Professor Dariusz Leszczynski commented on the private club ICNIRP, a pressure-group spun out of the nuclear weapons industry with the aim of maximising radiation levels, that "It is clear from their choices that the new members are selected based not only on their scientific merit and stature but also on their opinion on risk. In this way, ICNIRP always consists of scientists with similar opinions. This prevents real scientific debate." He then asked, in his Washington Post comment of 17th October: "What will happen if ICNIRP is wrong? … Who will be responsible for health problems if ICNIRP is wrong?" Prof. Leszczynski argued that the ICNIRP may be wrong, because in 2011 WHO's IARC voted 28 to 2 to classify mobile phone radiation as a possible carcinogen, but ICNIRP stated the opposite, even though many IARC members work or worked for ICNIRP. "The telecom industry should stop blindly following what the ICNIRP says." "The scientific evidence indicates that the safety standards are inadequate to protect adult avid cell phone users." And what about children, pregnant women, old persons or people with disease?

Pro-industry ICNIRP against research: instead “wait and see if tumor rates go up”

ICNIRP is a “self-perpetuating group that declines to disclose its finances”; its Standing Committee on Epidemiology “has only welcomed the like-minded”, according to Microwave News on 6th July 2011 and 25th September 2013. Its previous chairman, Anders Ahlbom, resigned from IARC after he allegedly failed to declare that he was a director of a company involved with the mobile phone industry. He was the lead author, with PHE’s AGNIR’s Feychting and Swerdlow, and the other anti-research members, Kheifets and Savitz, of an ICNIRP review of mobile phones and cancer, which claims in the Abstract that “Overall the studies published to date do not demonstrate a raised risk for any tumor of the brain within approximately 10 years since first use; … Also for longer latencies, the available data do not suggest an association between mobile phone use and fast-growing tumors such as glioma.”

Microwave News concluded with: “What’s the game plan for finding out whether cell phones cause cancer? ICNIRP says that we should simply wait and see if tumor rates go up.” The downside: “If we see a measurable uptick in the next decade or two, we’ll know that ICNIRP gave us some bad advice.”

Pro-industry pressure-group ICNIRP against ELF research

Feychting, vice chair of ICNIRP, has now joined pro-industry acitivists who want to end various types of EMF research, according to Microwave News on 25th September. In 2010, Kheifets, from the USA electricity companies’ EPRI, and Swanson from the UK’s National Grid, both scientific advisors to ICNIRP, also called for an end to the study of ELF electric fields. Also in 2010 Schmiedel, of the Danish Cancer Society, infamous for a study which discounted the likely heaviest mobile users, and Blettner, the lone dissenter against IARC’s classification of RF as a 2B cancer agent, called for an end to epidemiological studies of EMFs and childhood leukaemia. Ironically, Feychting started her career with a study linking EMFs to childhood leukaemia, as did Savitz, author of another “Enough is Enough” article against ELF research. When the larger group of international scientists behind BioIniative 2012 declare ELF is a class 1 certain cancer agent, observers can see why the pro-industry pressure-group ICNIRP is so worried.

ICNIRP and WHO in muddle on non-thermal electro-stimulation and ES

The ICNIRP’s attempt in 2010 (Health Physics) to justify its extraordinarily high heating-only limits for ELF (frequencies <100 kHz) curiously accepted electro-stimulation at non-thermal levels, but at the same time rejected the evidence for ES at non-thermal levels. The latter was based on a psychological evaluation by Rubin, whose understanding of the non-linear nature of ES has been shown to be flawed (see under “Voodoo science” in AGNIR criticism), and whose 2005 analysis covered mainly RF psychological tests rather than ELF studies. In fact the WHO Environmental Health Criteria no. 238 on ELF of 2007 claimed that ES “symptoms are not explained by any known medical, psychiatric or psychological disorder,” while quoting Rubin’s mainly RF hypothesis as evidence, even though Rubin claimed a psychological explanation which the WHO explicitly rejected. The WHO fact sheet 322, also on ELF, simply stated that the evidence for the other adverse health effects caused by ELF is “much weaker” than for childhood leukaemia, an effect discovered in 1979 and now accepted by almost all scientists, but it did not clarify the strength or significance of the evidence. Neither ICNIRP nor the WHO are advised by leading medical doctors involved in diagnosing and treating people with ES, and both are influenced by pressure from the wireless industry and governments, so this chaotic situation is not surprising. People suffering the effects of ES deserve the support of medical experts in this field rather than unproved “Voodoo science” hypotheses from groups like PHE’s AGNIR, the ICNIRP and WHO.

ICNIRP lacks expertise on ES: ICNIRP member denies evidence on ES

Another extraordinary claim by the Australian psychologist Rodney Croft, reported in News.com on 29th September, was that there was “absolutely no evidence’’ of people suffering sensitivity to EM radiation and “The research is well and truly in the court of it not having an effect, but people are still complaining.’’ [ES was first described in the scientific literature in 1932. It was classified by the

international Nordic Council of Ministers as ICD-10.R68.8 in 2000, and by the Austrian Medical Association as ICD-10.Z58.4 in 2012. It was described as a “disabling condition” with “real” symptoms, and not a “known psychological disorder” by the WHO in 2005-07. It has been recognized in courts and tribunals around the world and has been experienced by many thousands of people, including doctors, scientists and psychologists. It is therefore unclear whether Croft has been accurately reported, or was referring to some other condition, or, as a psychologist, is not as up to date in his knowledge of the science of ES as the medical doctors around the world who diagnose and treat thousands of people with ES. Like PHE’s AGNIR, ICNIRP has no medical doctor experienced in diagnosing and treating people with ES. - Ed.]

ICNIRP member paid by Australian government to “debunk” critics

A research team led by Prof. Rodney Croft, a psychologist and a member of the pro-industry private pressure-group ICNIRP, is to be paid $5M over five years by the Australian government partly to “debunk” critics, according to a GSMA press release on 26th September. In addition to a sleep study on children, it will apparently aim to silence independent scientists: “Another research focus will be on debunking criticism by activists and the researchers will also look into the role EM energy plays in people who claim to be sensitive to wireless signals.” [In fact the scientific majority has accepted adverse effects from non-thermal EM exposure since 2008, as shown by IARC’s classifications in 2001 and 2011. Should governments be using tax-payers’ money for psychologists to “debunk” medical evidence criticizing their controversial hypothesis? Should tax revenues and industry profit be put before ordinary people’s health? – Ed.]

Croft on ES health impairment: “a big problem”, “what’s actually causing it?”

Croft said about health effects from EM exposure, according to iTnews on 10th September: “We’re at a kind of difficult point because a lot of people are suffering. When you look at the distribution across most first world countries, you find it’s around about 3-to-8% of people [that] report quite significant health impairment due to this [condition]. It clearly is a big problem that needs to be dealt with, but the issue is what’s actually causing it?” He claimed scientists have still not found the cause: “If RF isn’t involved, what do we classify ... someone [that] reports symptoms that we can’t find a known cause for? And that gets a little bit more tricky.” [Scientists identified the cause in 1932; a few psychologists, like Croft, do not appear to be fully briefed on this medical condition. – Ed.]

Thank you again for taking public comments, and then allowing for a period of followup replies to comments as well. Please lower standards asap for radiofrequency/microwave radiation.

I understand that the wireless industry is extremely important to the US economy, but there are better and safer ways of providing access to the internet (cabled connections) so that we don't suffer so much. As it is, we are killing ourselves from the diseases caused by RFR exposure which may not only lead to sterility but also result in passing on permanent genetic birth defects onto the next generation) all for the sake of wireless convenience, without knowing the tragic health consequences until it is too late. Thank you for your consideration of my comments, replies and attachments and concern for people’s health. Please seek out the guidelines from the BioInitiative Report updated in 2013, that is where the FCC should go, not to the industry sponsored/supported IEEE and INCIRP committees.

Regards,

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