FCC 14-285

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Technology Transitions	)	GN Docket No. 13-5
	)	
AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition	)	GN Docket No. 12-353

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

Comment Filed by: **Dan Kleiber**
N9387 Riverview Dr.
Waterloo, WI 53594
(920) 478-9696
kleiber@gdinet.com

April 8, 2014

Dear Sir or Madam,

I am writing to urge you not to move forward with the technology transitions experiments and to instead open Notices of Proposed Rule Making (NPRM) with the aim of protecting the civil rights of people with radiofrequency sickness and tightening engineering standards for electronic devices to protect human health from the “dirty” electricity they produce.

Please deny the AT&T request to conduct their technology transitions experiment.

The wireless technology that AT&T proposes to replace many landline phones with has been classified as a class 2B possible carcinogen by the World Health Organization and only complies with completely outdated thermally-based "safety" limits. It should not be forced on ANY telephone customers. Use should be discouraged, not encouraged, because additional use means an increase in unavoidable radiation emissions from antenna installations, resulting in increased health risks for surrounding citizens and increased environmental damage (http://www.youtube.com/watch?v=wARxnaxrRKk). Experts think the classification should be changed to probable carcinogen or even carcinogen - http://thetruthaboutsmartgrids.org/2013/12/04/rf-fields-possibly-probably-or-definitely-carcinogenic/

Transmitted radiofrequency radiation (rf) from any source negatively affects my health and that of my family. I am a type I, insulin-dependent diabetic. As such, I test my blood sugar many times per day. I have noticed that rf causes my blood sugar to increase in dangerous ways. On a week-long vacation to visit family, a wireless router caused my blood sugar to become very high. No matter how much insulin I used, I could not get my blood sugar to return to normal, acceptable levels. We ended up cutting our vacation short in order to bring my blood sugar back to normal. Later, we figured out what had happened. The owner of the router (a Microsoft Broadband Networking Wireless Base Station MN-700) was kind enough to turn it off during our next visit and my blood sugar was fine, until the morning we were leaving when it went up. When I checked, the router had been turned on.

One afternoon, a neighbor rode with me in my combine while I was harvesting corn. He had his cellular telephone turned on in his pocket. Shortly after he joined me, my blood sugar began to increase. I took some insulin to try to bring it back down, but to no avail. So I tried again. And again. Still without success. Later that afternoon, my neighbor left, taking his cellular telephone with him. My blood sugar immediately dropped to dangerously low levels once I was no longer exposed to the rf from the cellular telephone. Again, I didn’t figure out what had happened until I had time to think later. This was one of the first times I was exposed to a cellphone in close proximity for several hours in a row. Now, in similar situations I ask that the phone be turned off.

My experiences with the router and cellphone show how rf affects me. In both situations, I was able to address the issue by asking that the devices be turned off. However, I do not have that option if I am forced to use a wireless device to communicate.

Other sources of rf also cause my blood sugar to increase. Dimmer switches, compact fluorescent lights, and variable speed motors all generate rf. Recently, the rise of wireless technology has greatly increased the incidence of rf. WiFi and cellphones make it difficult for me to conduct business or to travel. Forcing me to use a cellphone or electrically polluting technology to communicate could easily cause serious potentially life-threatening functional impairment for me and violate my rights under the ADA.

Copper line service carries its own power. Neither U-Verse, cell antennas, nor cellphones necessarily do. What of reliability during disasters? This is especially important since smart meters have increased the vulnerability of the electrical grid (http://www.gettingsmarteraboutthesmartgrid.org/, http://electromagnetichealth.org/wp-content/uploads/2014/02/Smart-Grid-Report-3-15-13.pdf). Major outages have increased in the last few years.

No one should be forced to switch from the tried and true safety of landlines to a potentially hazardous technology compliant only with outdated safety limits. In a recent letter, the United States Department of the Interior states that "the electromagnetic radiation standards used by the Federal Communications Commission (FCC) continue to be based on thermal heating, a criterion now nearly 30 years out of date and inapplicable today" (http://www.ntia.doc.gov/files/ntia/us_doi_comments.pdf. Any projects moving telephone service from landlines to wireless technology should be placed on hold until the FCC Docket (ET docket 13-84) looking at the outdated FCC rf limits reaches completion.

A NEPA evaluation and EIS are necessitated by the presence of three options which have the potential to have radically different impacts [Burkholder v. Peters, 58 F. App'x 94, 96 (6th Cir. 2003) (quoting42 U.S.C. § 4332(2)(C)).] The EIS should include a review of the impact of all options on the environment, as well as on human health and safety. "The Report on Possible Impacts of Communication Towers on Wildlife Including Birds and Bees" commissioned on 30 August 2010 by the Ministry of Environment and Forest, Government of India (incorporated by reference herein in its entirety http://www.moef.nic.in/downloads/public-information/final_mobile_towers_report.pdf) and "Impacts of radio-frequency electromagnetic field (RF-EMF) from cell phone towers and wireless devices on biosystem and ecosystem – a review," (incorporated by reference herein in its entirety http:// www.biolmedonline.com/Articles/Vol4_4_2012/Vol4_4_202-216_BM-8.pdf) and the letter from the Department of Interior (incorporated by reference herein in its entirety http://www.ntia.doc.gov/files/ntia/us_doi_comments.pdf) provide enough compelling evidence of potential environmental harm at existing rf limits to necessitate an EIS evaluating the harm done by promoting additional wireless use and installation, or continuing in the status quo, compared to requiring repair of existing landline telephone infrastructure and pricing of wireless service to discourage frivolous use of wireless technology.

Abandoning copper landline phones will leave many people with radiofrequency sickness, electromagnetic hypersensitivity, etc. cut off from the world. Therefore, abandoning landlines is not in compliance with the ADA (Americans with Disabilities Act), particularly the 2008 ADA

Amendments, which base their disability determination on interference with bodily functions (http://www.govtrack.us/congress/bills/110/s3406/text). There are many, many studies which corroborate my experience and show that rf radiation interferes with bodily processes, often seriously (www.bioinitiative.org).

Courts have interpreted the ADA and the 2008 ADA Amendments broadly to ensure accessibility throughout society and require broad inclusivity. (http://www.justice.gov/osg/briefs/2003/3mer/2mer/2002-1667.mer.aa.html, http://disabilitylaw.blogspot.com/2012/06/d-mass-allows-ada-title-iii-challenge.html) Thus, telecom companies cannot abandon landlines until they have a technology that provides an equal or better level of access to people with symptoms of rf sickness - estimated at 3-30% of the population and ranging from severely impaired to less severely impaired. People with rf sickness or functional impairments induced by rf exposure cannot safely use wireless technology or technology which exposes them to rf on wiring.

No new source of radiation exposure should be allowed without examining the ADA compliance. Many people are now excluded from public buildings, public places, parks, highways, and limited in almost all aspects of normal daily living. Continued rollout of additional sources of rf radiation puts the FCC in direct violation of the ADA. "Public safety standards are 1,000 – 10,000 or more times higher than levels now commonly reported in mobile phone base station studies to cause bioeffects."(http://www.bioinitiative.org/conclusions/)

The FCC has a duty to the public to protect the public health and safety from harm from radiofrequency radiation. (H.R. Report No. 104-204, p. 94) FCC does not possess the expertise to set biologically-based radiofrequency radiation safety limits. The Environmental Protection Agency (EPA) does. Therefore, the FCC should advocate that Congress direct the EPA to establish biologically-based radiofrequency radiation safety limits and provide the budget and resources to carry out that task. 2012 HR6358 was an excellent example of legislation to authorize the EPA to establish biologically-based radiofrequency radiation safety limits

For safety reasons, the FCC must halt all technology transitions experiments and should instead be opening supplemental NPRMs. One NPRM should develop rules to protect the civil rights of people with rf sickness and people who experience functional impairment with exposure to rf. A second NPRM should develop engineering standards that protect human health from rf on wiring from which it both radiates and capacitively couples to people in the vicinity.

Sincerely,

Dan Kleiber