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August 16, 2014

The Honorable Thomas Wheeler
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Regarding:

Reassessment of the Federal Communications Commission
Radiofrequency Exposure Limits and Policies; and

Proposed Changes in the Commission's Rules Regarding Human
Exposure to Radiofrequency Electromagnetic Fields.

Dear Mr. Chairman:

The Mechanical Contractors Association of America is a non-profit construction trade association representing more than 2,500 firms involved in the mechanical construction and service industry nationwide and overseas. These firms employ more than 270,000 union workers.

MCAA is pleased that the commission is considering some of the issues concerning occupational exposure to RF radiation in its further notice of proposed rulemaking covering human exposure to radiofrequency electromagnetic fields. However, the association believes that the FCC should consider additional requirements in the final rule to help protect workers performing transient tasks from overexposure to RF radiation.

The vast majority of MCAA members perform mechanical service work. Their service technicians maintain and repair heating, ventilation, and air conditioning equipment, which requires them to perform much of their work on building rooftops. MCAA is concerned that mechanical service technicians may be unwittingly overexposed to radiofrequency (RF) radiation because their employers are rarely informed about the presence of and the potential hazards associated with cellular telephone antennas. The concern is exacerbated when stealth antennas are in use because they can be

extremely difficult to identify. Further, even when technicians are aware of existing RF transmitting antennas in their transient workplaces they typically don't know whether they are being overexposed to RF radiation, nor do they know how to protect themselves from overexposure.

MCAA respectfully requests that the commission consider adding language to its final rule, based on the following bullet points, to help protect affected workers from overexposure to RF radiation.

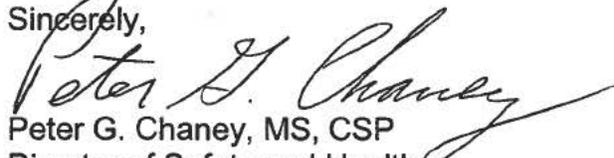
- When one or more RF transmitting antennas are present on a building rooftop the affected FCC licensee(s) should be required to generate and provide brief, written *RF Radiation Exposure Summary Reports* to all affected building owners, building managers, and building management companies. The reports should be presented on a simple, standardized form. Each completed form should include:
 - the number of cellular telephone antennas their company has installed on the rooftop;
 - precisely where each antenna is located;
 - whether any of their antennas are “stealth antennas”, and if so, how they can be identified;
 - how much RF radiation is generated from the antenna or antennas (exposure level ranges);
 - what direction, or directions the RF radiation is emitted; and
 - the minimum safe work distance from the antenna or antennas.
- All affected building owners, building managers, and building management companies should be required to inform all of their affected contractors and subcontractors about the presence of RF transmitting antennas, and provide them with a copy of the *RF Radiation Exposure Summary Report*.

A preferable alternative to RF Radiation Exposure Summary Reports, which MCAA hopes will be considered by the FCC for inclusion into the final rule, would be a readily accessible, central data base where employers and their workers could instantly access the information described in the sub-bullets above for every affected building in the nation. The system could work very much like the existing “Call Before You Dig” system, which has successfully protected underground utilities and affected workers nationwide for many years. Such a system for instantly accessing critical safety information coupled with safety training programs for affected workers would have a substantive, positive impact on reducing the incidence of overexposure in transient rooftop workplaces. MCAA understands that establishing such a system would take time. However, the association believes that a system of *RF Radiation Exposure Summary Reports* would

suffice in the short term while the database is being established, tested and implemented.

MCAA thanks you in advance for considering these recommendations. Please feel free to contact me if you have any questions, or if you need further assistance.

Sincerely,



Peter G. Chaney, MS, CSP
Director of Safety and Health