

Comments to Request for Information on Electromagnetic Fields (EMFs) and Radiofrequency (RF) Radiation Exposure

Living in Manhattan's high-density urban core—with a high concentration of cellular infrastructure and immediate proximity to an Intermediate Distribution Frame (IDF) hub—resulted in continuous, long-term environmental EMFs and RF radiation exposure. This chronic proximity to small cells and industrial-grade routing equipment precipitated severe, debilitating insomnia and Electromagnetic Hypersensitivity (EHS), which ultimately led to my current medical disability. Furthermore, the high-intensity EMFs and RF radiation inherent in diagnostic MRI scans served as a compounding physiological trigger. This accumulated exposure reactivated a dormant Epstein-Barr virus (EBV) infection, resulting in clinical diagnoses of Chronic EBV and Chronic Fatigue Syndrome (CFS). Consequently, my environmental doctor advised an immediate medical resignation due to severe symptoms directly exacerbated by radiation-generating equipment in the workplace.

The subsequent six-year administrative appeal for disability benefits represents a protracted, systemic challenge that disproportionately burdens vulnerable claimants. It is critical to establish the biological mechanisms of RF-induced health impacts to protect public health, secure the right to equitable legal remedies, and implement stricter zoning regulations regarding residential cellular infrastructure.

- **Regulatory Negligence:** Both class-action and individual lawsuits are justified against the FCC due to its reliance on outdated 1996 RF safety guidelines. The Commission has systematically failed in its regulatory oversight by ignoring the concurrent impacts of electric fields, magnetic fields, and “dirty electricity” (transient emissions generated by modern infrastructure like LEDs, routers, and cell towers) alongside RF radiation exposure, demonstrating a critical failure to respond to modern technological advancements.
- **Epidemiological Evidence & Environmental Load:** Decades of peer-reviewed studies link RF radiation to 23 chronic illnesses, including the perpetuation of chronic infections like EBV. High-density environments exacerbate this risk; for example, wireless radiation in New York City has increased 100-fold over 50 years, creating dense environments where cell towers within a 1/4-mile radius generate dangerous exposure levels.
- **Constitutional Violations:** Forcing citizens to endure documented environmental hazards based on outdated, 30-year-old guidelines is unconstitutional. Regulators violate due process by willfully ignoring decades of user testimony and medical reports in favor of obsolete data.
- **Specific Evidence & Personal Injury:** Personal harm directly resulted from prolonged, close-proximity exposure to cell phones, MRIs, business-class routers, and dense wireless infrastructure. Independent EMF specialist testing establishes that the human body acts as an antenna for simultaneous frequencies (particularly at 3-4 GHz).

My Severe EMF/RF Radiation Reactions: A Comprehensive Symptom List

Muscle tightness or weakness that feels like slowly becoming paralyzed, overall body pain, numbness, pain in the back of the skull, and an inner burning, tendon-pulling feeling. Other symptoms include anxiety, agitation, extreme fatigue, insomnia, chest tightness, difficulty breathing, heart palpitations, dizziness, nausea, brain fog, disorientation, tinnitus, ear pain, pressure in the head, eye pain, blurriness, migraines, dry skin and eyes, flu-like symptoms, sore throat, periodic swollen glands, fever, diarrhea, an itchy rash, frequent urination, a shaky voice, and sensitivity to light.

ROUTERS: BUSINESS and TOTAL-HOME WIFI CONCERNS

Documented evidence links RF radiation to insomnia and neurological distress. Following four years of zero exposure, a two-day exposure to a high-performance Total Home Wi-Fi router (measured at 1 million W/m²) triggered severe health symptoms, mirroring daily torment at my former workplace. This patterns a past incident in Manhattan, where a newly installed apartment router caused severe convulsions, non-stop coughing, heart palpitations, and flu-like symptoms that only subsided once the unit was unplugged. High-performance home routers act as indoor small cells; the public must be warned that these router transmitters cause severe biological stress, and perpetuate chronic infection, especially EBV.

When wireless devices are maintained in direct contact with or in close proximity to the body, they lower immunity and cause immense physical strain and long-term impairment. I determined that the EMF/RF radiation from the office were the primary factors impacting my health, a conclusion corroborated by the cessation of my symptoms upon terminating device usage and a medical leave. Following a month-long medical leave, my return to the assigned office environment confirmed the adverse effects of that workspace, ultimately resulting in a medically advised resignation.

The targeted area utilized a high density of small-cell wireless infrastructure, including installations located directly adjacent to my office building. While navigating this area, I noticed a distinct onset of symptoms—including brain fog, headaches, disorientation, a burning sensation in my head, and tightening neck muscles—whenever I crossed from one avenue to the next. Based on these observations and related cell-tower exposure, it is my position that prolonged, close-proximity exposure to an Intermediate Distribution Frame (IDF) closet configured with enterprise-grade routing equipment produces biological and environmental effects comparable to those of small-cell installations and directed energy technologies.

THE CHRONICALLY ILL NEED SAFE AREAS

The rapid proliferation of cell towers and data centers in residential areas has created an urgent need for low-EMF 'white zones.' Current regulations completely fail to protect individuals living with EHS and chronic illnesses. Finding a safe, non-remote home has become nearly impossible, forcing a highly vulnerable population out of their communities. We need immediate zoning laws that ban cell towers in designated areas to protect citizens from severe health crises.

Furthermore, the Social Security Administration is failing our most vulnerable citizens by delaying urgent disability assistance. Without this vital safety net, chronically ill individuals who can no longer work are being directly driven into homelessness and financial ruin. We need immediate reform to expedite disability support and protect people's livelihoods.

A HIGH VIRAL LOAD OF EBV AND/OR OTHER VIRUSES INCREASES EHS. EMF and RF RADIATION LOWERS IMMUNITY, REACTIVATES AND PERPETUATES CHRONIC INFECTION, ESPECIALLY EBV. VACCINES and MRIs (which use strong EMF and RF RADIATION) ARE REACTIVATING EBV AND OTHER VIRUSES.

- **Exposure to a 50Hz electromagnetic field induces reactivation of the Epstein-Barr virus genome in latently infected human lymphoid cells**
<https://pubmed.ncbi.nlm.nih.gov/9276003/> What 50 Hz means: “A traditional wired desktop computer can emit 60-100 Hz. How does that relate to your current wireless technology exposure? Wireless connections are 10 MHz to 300 GHz. What does that mean? There are one million hertz in one megahertz and one billion hertz in one gigahertz! Radio, television, radars, radio transmitters, cellular telephone antennas, cell phones, microwave ovens (which notoriously “leak”), and smart meters installed on residents’ homes are inescapable in our immediate environment at home or at work.” –*The Epstein-Barr Virus Solution: The Hidden Undiagnosed Epidemic of a Virus Destroying Millions of Lives through Chronic Fatigue, Autoimmune Disorders, and Cancer* by Dr. Kaisa Kines.
- **Epstein-Barr Virus** Over ninety-five percent of the population has EBV, which has over sixty strains and can reach higher debilitating stages. EBV continues to get misdiagnosed, but is the underlying cause of many symptoms, conditions and diseases, including **Cancer, Chronic Fatigue Syndrome, Multiple Sclerosis, Rheumatoid Arthritis, Fibromyalgia, Lupus, Lyme, Tinnitus** and much more. Mononucleosis is stage two EBV. See **Medical Medium Revised & Expanded Edition** and <https://medicalmedium.com/blog/epstein-barr-virus-its-out-of-control>.
 - A January, 2023 study shows that Covid was reactivating EBV and HHV-6 causing long Covid symptoms <https://pubmed.ncbi.nlm.nih.gov/36851614/>. The interaction between EBV, EMF and RF radiation has severe negative impacts on immunity which is being grossly overlooked.
- **1997 EBV Study/Epstein-Barr Virus Reactivated by Electromagnetic Field:** <https://ebvhelp.com/epstein-barr-virus-reactivated-by-electromagnetic-field/>. A high viral load of EBV can increase EHS and a 1997 study shows that exposure to a 50 Hz electromagnetic field reactivates EBV. **Relevance of these studies for EBV:** “Anything that is neurotoxic is not helpful for a person with Chronic Activated EBV because Central Nervous System is one of the preferred locations of EBV to live in. In other words, our CNS is getting hit by EMF and EBV.” –Dr. Kasia Kines
 - Based on the 1997 EBV study and others, my own experience and society, sending a person with a history of EBV to get an MRI is like being sent to the electric chair—only you don’t die, you just become the walking dead long after it’s over. When you’re in an MRI machine, which can be for the duration of 20-90 minutes, the electromagnetic current is oscillating throughout your entire body and at levels that are way above 50 Hz. **FDA MRI Radiation:** <https://www.fda.gov/radiation-emitting-products/medical-imaging/mri-magnetic-resonance-imaging> “MRI scanners use strong magnetic fields and radio waves to make images. During an MRI exam, an electric current is passed through coiled wires to create a temporary magnetic field in a patient’s body. Radio waves are sent from and received by a transmitter/receiver in the machine...” If warnings advise not to stand in front of a microwave, why is it ok for your entire body to be “cooked” in an MRI for an hour that uses radio waves along with strong magnetic fields that have the ability to fling a wheel chair across a room?

- **FDA Drug Safety Communication:** FDA warns that gadolinium-based contrast agents (GBCAs) are retained in the body; requires new class warning <https://www.fda.gov/drugs/drug-safety-and-availability/fda-drug-safety-communication-fda-warns-gadolinium-based-contrast-agents-gbcas-are-retained-body>
Some people believe that gadolinium—a toxic, rare-earth metal—is the only thing affecting them during an MRI. However, the incredibly high levels of EMF and RF radiation emitted by the machine itself also play a major role. Regardless of gadolinium use, MRI procedures carry the potential to reactivate latent viruses in addition to causing distinct tissue or cellular damage.
- **MRI Facilities** The MRI imaging itself causes DNA damage and also increases the destruction of the gadolinium. Excerpt from MedInsight: *“Gadolinium is highly toxic to humans. Gadolinium can cause a host of toxic effects, including inflammation, oxidative stress, neurological damage, and damage to our genes, or DNA. The damage to cells from gadolinium is exacerbated by exposure to the magnetic fields of MRI scanners.”* **Enhanced cytotoxic and genotoxic effects of Gadolinium following ELF-EMF irradiation in human lymphocytes** <https://www.ncbi.nlm.nih.gov/pubmed/24479558>.
- In his book **EMFD*: 5G, Wi-Fi & Cell Phones: Hidden Harms and How to Protect Yourself**, Dr. Joseph Mercola details key EMF biological mechanisms and the clinical benefits of environmental mitigation:
 - **Heavy Metals as Antennas:** Relying heavily on the clinical research and protocols of Dr. Dietrich Klinghardt, Mercola argues that heavy metals in the human body act like "micro-antennas" that attract and concentrate wireless radiation.
 - **Sweat Glands and 5G:** He points to a 2016 Federal Communications Commission (FCC) letter by Dr. Yael Stein of the Hebrew University of Jerusalem regarding 5G millimeter wave (MMW) technology. Stein’s computer simulations demonstrate that human sweat glands act like an array of tiny helical antennas, effectively absorbing sub-terahertz waves deeper into the skin.
 - **Home Mitigation Benefits:** He highlights studies showing that mitigating EMF in the home—such as turning off Wi-Fi and electricity in the bedrooms of autistic children—led to significant behavioral and physiological improvements over time.

DECADES OF NEGLIGENCE: GOVERNMENT KNOWLEDGE OF RF RADIATION HARM

- **For 50 Years Regulators Ignored Report Linking Wireless Radiation to 23 Chronic Diseases** <https://childrenshealthdefense.org/defender/50-years-regulators-wireless-radiation-23-chronic-diseases/>
- **Physicians for Safe Technology/Scientific Evidence/ Military and Government Reports** <https://mdsafetech.org/science/military-studies-and-compendiums/>
- **“Barrie Trower is a former military microwave weapons expert and EM Radiation Research Trust advisor. In his 2022 brief paper, Trower issues a clear warning: public health must be prioritized amidst the ubiquitous presence of mobile phone.** <https://radiationresearch.org/wp-content/uploads/2022/10/B-Trower-ADDICTION-2022-002-3.pdf>

- **Future Warfare slide that NASA created before 911.** See all the disturbing and shocking NASA Future Warfare slides/downloadable pdfs here: <https://archive.org/details/FutureStrategicIssuesFutureWarfareCirca2025/mode/2up?s=09>
 - Effects of Low Power Microwaves (U.S. Army, SRI, Walter Reed)
 - Behavioral performance decrements
 - Seizures
 - Gross alteration in brain function
 - 30% to 100% increases in brain blood flow
 - Lethality
 - Interactions between low power (microwatts per sq. cm./4 to 3 GHz) MW and brain function.
- **The Mind Has No Firewall, by Timothy L. Thomas (US Army War College)** <https://share.google/B1kmdZpBkEC8Rmihi>
- **Targeted-Civilians-with-Directed-Energy.pdf, by Sami Dia (cisisunseen.com)**
- **Microwave radiofrequencies, 5G, 6G, graphene nanomaterials: Technologies used in neurological warfare** <https://pmc.ncbi.nlm.nih.gov/articles/PMC11618680/?s=09>

REACTIVATING AND PERPETUATING ILLNESS: WHY SECTION 704 OF THE 1996 TELECOM ACT MUST BE REPEALED

- **RF radiation perpetuates chronic infection, lowers immunity and thickens the blood**
 - **Immune responses of a wall lizard to whole body exposure to radiofrequency electromagnetic radiation** Test results revealed a noticeable suppression (approximately 45%) of inflammatory responses to RF radiation exposed lizards. <https://www.tandfonline.com/doi/full/10.3109/09553002.2016.1135262>
 - **Evidence for a connection between coronavirus disease-19 and exposure to radiofrequency radiation from wireless communications including 5G** This study identified six specific ways wireless radiation suppresses immune function. <https://pmc.ncbi.nlm.nih.gov/articles/PMC8580522/>
 - Blood cell changes causing clotting issues
 - Impaired circulation and reduced oxygen
 - Immune system dysfunction and suppression
 - Increased cellular oxidative stress and organ damage
 - Enhanced viral entry pathways
 - Worsen heart arrhythmias and cardiac disorders
- **Speed Should Not Come Before Safety: Testimony on Data Center Pollution, Powerline EMF Health Risks - Environmental Health Sciences** <https://ehsciences.org/speed-should-not-come-before-safety-testimony-on-data-center-pollution-power-line-emf-health-risks/>
- **Evicted by a Cell Tower (2022)** The Pittsfield, MA case proves how real people are suffering from RF radiation, especially where cell towers have been installed <http://maisonsaine.ca/english?id=100269>
- **HIGH Wi-Fi Levels in Schools and Depression** Video of a boy with straight A's, who after being seated next to a router in high school, started getting brain fog, anxiety and depression and failed two of his favorite classes. <https://youtube.com/watch?v=W9-LS7nDONw&feature=shared>.

- In this article, Alison Main gives a great, detailed description of what is happening to people; her story, as well as Dr. Sosa's and Diane Grassi's, is similar to mine.
Electrosensitivity: When the Modern World Hurts <https://bestselfmedia.com/electrosensitivity/>.
The Dr. Carlos Sosa Story <https://latitudes.org/electromagnetic-sensitivity-and-carlos-sosa-md/>.
Diane Grassi <https://childrenshealthdefense.org/community/emr-syndrome-i-have-lost-my-career-my-hair-and-my-voice/>

RHEUMATOID ARTHRITIS / DISEASES and EBV

- a) Epstein-Barr Virus and Neurological Diseases**
<https://pubmed.ncbi.nlm.nih.gov/35083281/>
- b) Activation of Epstein-Barr virus by saliva from Sjogren's syndrome patients – PMC**
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1782400/>
- c) Chronic Fatigue Syndrome / Myalgic Encephalomyelitis**
https://www.researchgate.net/publication/385109212_Hypothalamus_Connectivity_in_Adolescent_Myalgic_EncephalomyelitisChronic_Fatigue_Syndrome
- d) Electrosmog and autoimmune disease PMC**
<https://pmc.ncbi.nlm.nih.gov/articles/PMC5406447/>
- e) Lupus and EBV**
 An increased prevalence of Epstein-Barr virus infection in young patients suggests a possible etiology for systemic lupus erythematosus
<https://pubmed.ncbi.nlm.nih.gov/9399948/>
Epstein-Barr virus infection induces lupus autoimmunity
<https://pubmed.ncbi.nlm.nih.gov/17121489>
- f) 'Mono' Virus Linked to Seven Serious Diseases**
<https://www.cincinnatichildrens.org/news/release/2018/mono-virus>
<https://www.rheumatologyadvisor.com/home/general-rheumatology/reactivation-epstein-barr-virus-pathogenesis-development-of-rheumatoid-arthritis-ra/#>
- g) CHD TV The People's Study Video – Juvenile Arthritis After MMR Vaccination**
https://live.childrenshealthdefense.org/chd-tv/events/the-peoples-study/juvenile-arthritis-after-mmr-vaccination-fl/?utm_source=luminate&utm_medium=email&utm_campaign=chdvtv&utm_id=20250312
- h) The Epstein-Barr Virus Solution by Dr. Kaisa Kines – *The Hidden Undiagnosed Epidemic of a Virus Destroying Millions of Lives through Chronic Fatigue, Autoimmune Disorders, and Cancer*** Pgs. 71-72 outlines EBV's involvement in many of the diseases mentioned in these studies and Medical Medium books. Dr. Kines' book is a good EBV resource, while the Medical Medium book series offers a deeper, more advanced exploration of the topic.

MYASTHENIA GRAVIS and EBV

- a) Epstein-Barr Virus in Myasthenia Gravis: Key Contributing Factor Linking Innate Immunity with B-Cell-Mediated Autoimmunity | IntechOpen**
<https://www.intechopen.com/chapters/73437>
- b) Is Myasthenia Gravis a Real Complication of the COVID-19 Vaccine? A Case Report-Based Systematic Review – PMC**
<https://pmc.ncbi.nlm.nih.gov/articles/PMC9509275/>

c) **Inflammation and Epstein-Barr Virus Infection Are Common Features of Myasthenia Gravis Thymus: Possible Roles in Pathogenesis – PMC**
<https://pmc.ncbi.nlm.nih.gov/articles/PMC3180177/>

AUTISM and EBV

a) **Evaluation of antibodies to Cytomegalovirus and Epstein-Barr virus in patients with Autism** <https://journals.sagepub.com/doi/10.3233/HAB-180335?icid=int.sj-abstract.similar-articles.2>

b) **Immune Dysfunction in Autism – The Autism Community in Action**
<https://taconow.org/family-resources/immune-dysfunction-in-autism/>

CANCER and EBV

a) **NIH Scientists find weak points on Epstein-Barr Virus.**
<https://www.nih.gov/news-events/news-releases/nih-scientists-find-weak-points-epstein-barr-virus> “Approximately 95% of the world’s population is infected with EBV, which remains in the body permanently, typically in B lymphocytes, which are anti-body-producing immune system cells, and cells lining the throat and pharynx. EBV can sometimes lead to B-cell cancers, including, Burkitt, Hodgkin and non-Hodgkin lymphomas, or to gastric or nasopharyngeal cancers. Recently, EBV infection was shown to significantly raise the risk of developing multiple sclerosis.”

b) **EBV, Nasopharyngeal Carcinoma, Burkitt's lymphoma, Hodgkins Lymphoma, Epstein-Barr Virus** <https://pmc.ncbi.nlm.nih.gov/articles/PMC9314235/>

c) **The role of Epstein-Barr Virus in Neurological Diseases**
https://www.researchgate.net/figure/The-role-of-Epstein-barr-virus-in-neurological-diseases-EBV-can-infect-the-organism_fig1_357748130

d) **CellPress: Epstein-Barr Virus: Biology and clinical disease**
<https://www.sciencedirect.com/science/article/pii/S0092867422011217>

e) **Epstein-Barr virus as a potentiator of autoimmune diseases**
<https://www.nature.com/articles/s41584-024-01167-9>

f) **Epstein-Barr virus infection in primary immunodeficiency**
<https://lymphosign.com/doi/10.14785/lymphosign-2018-001>

MULTIPLE SCLEROSIS and EBV

a) **Editorial: Epstein-Barr Virus and Multiple Sclerosis**
<https://www.frontiersin.org/journals/immunology/articles/10.3389/fimmu.2023.1330181/full>

b) **Nature: Epstein-Barr Virus and Multiple Sclerosis**
<https://www.nature.com/articles/s41579-022-00770-5>

c) **Epstein Barr Virus and Multiple Sclerosis – Jeffrey Dunn, M.D.**
<https://youtube.com/live/9hJA0lGslKI?feature=shared>

d) **MS Triggered by Vaccine**
<https://www.mctlaw.com/vaccine-injury/multiple-sclerosis-ms-triggered-by-vaccine/>

e) **Science.abj8222.pdf** Multiple Sclerosis Longitudinal analysis reveals high prevalence of Epstein-Barr virus associated with multiple sclerosis.

f) **MS and Electro-hypersensitivity**<http://magdahavas.com/electrosmog-exposure/multiple-sclerosis-and-electrohypersensitivity>