October 11, 2026

To the U.S. Department of Health and Human Services:
Re: Applying the precautionary principle to cell phone tower siting

I submit this comment as a neuroscientist who has conducted research on, and is knowledgeable about, the sensitivity of the central and peripheral nervous systems to electromagnetic fluctuations. My understanding of the electromagnetic fields generated by our bodies and the ways electromagnetic influences can affect bodily functioning informs my extreme concern about restrictions on considering potential health effects when deciding where cell phone towers may be placed.

I urge the Department of Health and Human Services (HHS) to work with the Federal Communications Commission (FCC) to address the framework established under **47 U.S.C. § 332(c)(7)(B)(iv)**. This provision prevents state and local governments from regulating the placement of personal wireless service facilities based on the environmental effects of radiofrequency emissions when those facilities comply with FCC emission regulations. Consequently, concerns about potential health effects generally cannot serve as grounds for denying a compliant tower's siting application. 47 U.S.C. § 332(c)(7)(B)(iv)

I object to this restriction and urge adoption of the precautionary principle: any concern about potential adverse health effects should be considered before a tower is permitted. People should not have to establish a scientific basis for their concern or demonstrate that harm has already occurred before that concern can influence a siting decision. The burden should rest with those proposing the tower to establish its safety, rather than with the people who would be exposed to establish its danger.

As a neuroscientist, my research and experience have made me aware of the sensitive nature of our central and peripheral nervous systems to even minute electromagnetic fluctuations. That experience reinforces my conviction that uncertainty about potential health effects must be grounds for caution. Compliance with an existing regulatory limit should not prevent people from raising health concerns or prevent decision-makers from acting on those concerns.

My concern is also informed by my own experience. A smart meter was installed on my home without my knowledge or consent. Immediately following its installation, I experienced the sudden onset of tinnitus, dizziness, heart palpitations, insomnia, and disorientation. These symptoms persisted until I discovered the installation and had the smart meter removed. Following its removal, all of the symptoms except tinnitus resolved. I have observed that the tinnitus also goes away when I spend time in environments away from electronically generated electromagnetic fields. Around the same time that my symptoms began, a large number of my patients also reported the sudden onset of tinnitus and other symptoms described above. These personal experiences and patient reports reinforce my conviction that concerns about potential health effects must be considered before exposure is imposed, and that people should not have to prove causation before their concerns can justify precautionary action.

The standard I am asking HHS to advocate is clear: **cell phone towers must be proven beyond any possible doubt to be safe for human health before they are allowed. If doubt about potential health effects remains or subsequently arises, that doubt must be permitted to serve as the basis for denying a siting application.** This is the precautionary standard I believe should govern these decisions. This same precautionary principle should be applied to all regulatory concerns affecting human health and well-being.

The Declaration of Independence affirms life, liberty, and the pursuit of happiness. The Fifth and Fourteenth Amendments protect against governmental deprivation of life, liberty, or property without due process of law. In my view, preventing people and their state or local governments from relying on potential health effects to oppose tower placement runs contrary to the protection of life and liberty embodied in these founding principles. People should not have to wait for injury, or prove that an injury will occur, before their concerns about their health can justify denying an application. Declaration of Independence, Fifth Amendment, Fourteenth Amendment

I therefore urge HHS to work with the FCC to:

1. **Advocate a precautionary approach** requiring consideration of any concern about potential health effects before approving cell phone tower placement, without requiring the person raising the concern to first provide scientific proof.
2. **Place the burden of establishing safety on the applicant**, using a standard of safety beyond any possible doubt before a tower is permitted.
3. **Allow doubt about potential health effects to serve as grounds for denying a siting application**, even when the proposed facility would comply with existing FCC emission limits.
4. **Seek the necessary statutory changes from Congress**, including amendment of § 332(c)(7)(B)(iv), and corresponding changes to FCC regulations and policies so that compliance does not foreclose precautionary decisions.

I ask HHS to advocate for the protection of human health before exposure is permitted. Any concern about potential health effects should receive consideration, the burden of proving safety should fall on the applicant, and doubt about safety should be a permissible basis for denying tower siting applications. The protection of life and liberty demands that people have the opportunity to prevent potential harm before it occurs.

Thank you for your consideration and the opportunity to comment.

Respectfully submitted,

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