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ID	1061794368090	**Proceeding**	OET 19-226
Names of Filers	Josh McLaughlin,Leslie McLaughlin		
Type of Filing	COMMENT	**Filing Status**	DISSEMINATED
Viewing Status	Unrestricted		
Total Pagecount	2		
Date Received	Jun 16, 2020	**Date Posted**	Jun 17, 2020
Address	P.O. Box 223	**City**	Warm Springs
State	GA	**ZIP**	31830

I do not support the proposed change to allow manufacturers to produce wireless devices that govern their own radiation power output, especially for notebooks and tablets frequently used by children who, according to the International Agency for Research on Cancer (IARC), are more vulnerable to RF radiation than adults.

Since the justification for this proposed rule change is that manufacturers want to be able to deliver more data to notebooks and tablets, it seems obvious that this change would result in higher exposures for users.

I object to the practice of allowing exposures to be averaged over time to comply with FCC exposure limits. There is no scientific basis to support the notion that short, periodic bursts of RF radiation are not biologically harmful, or that only cumulative effects over time may have an impact. The FCC should establish temporal limits for both Specific Absorption Rate (SAR) and power density.

Further, I agree with the American Academy of Pediatrics that the FCC's current method of testing wireless devices is not reflective of the way people actually use technology today. Given the increasing use of wireless devices by children and adolescents, we encourage the FCC to seek out and utilize testing protocols that reflect real-world situations.

Cell phone and wireless radiation causes cancer and other diseases because of cell damage. There is a plethora of scientific studies that shows this, including the National Toxicology Program of the U.S. Department of Health and Human Services.

I experience radiation sickness when exposed to wireless signals and cell phones, including headaches, nausea, fatigue, dizziness, and burning sensation. There are millions of people like me, and even though others may not feel symptoms, damage is occurring in all biological life due to electromagnetic frequencies.

It’s time to stop the damage being done on the American people.

NTP STUDIES & FINDINGS

https://ntp.niehs.nih.gov/whatwestudy/topics/cellphones/index.html

NTP conducted two-year toxicology studies in rats and mice to help clarify potential health hazards, including cancer risk, from exposure to RFR like that used in 2G and 3G cell phones which operate within a range of frequencies from about 700–2700 megahertz (MHz). These were published as Technical Reports in November 2018.

What did the studies find?

The NTP studies found that high exposure to RFR (900 MHz) used by cell phones was associated with:

- **Clear evidence of tumors in the hearts of male rats.** The tumors were malignant schwannomas.
- **Some evidence of tumors in the brains of male rats.** The tumors were malignant gliomas.
- **Some evidence of tumors in the adrenal glands of male rats.** The tumors were benign, malignant, or complex combined pheochromocytoma.

It was unclear if tumors observed in the studies were associated with exposure to RFR in female rats (900 MHz) and male and female mice (1900MHz).

The results are based on NTP's four categories of evidence that a substance may cause cancer: clear evidence (highest), some evidence, equivocal evidence, no evidence (lowest).

As a follow-up, NTP published an article in October 2019 that evaluated DNA damage in three regions of the brain, the liver, and in blood cells in rats and mice that were removed at an earlier timepoint from the ongoing 2-year toxicology study. DNA damage, if not repaired, can potentially lead to tumors. This work was also included in NTP's published Technical Reports, but this study includes analyses of the data in the supporting information not included in the Technical Reports.

NTP scientists found that RFR exposure was associated with an increase in DNA damage. Specifically, they found RFR exposure was linked with significant increases in DNA damage in:

- the frontal cortex of the brain in male mice,
- the blood cells of female mice, and
- the hippocampus of male rats.

There are many factors that influence whether damaged DNA will lead to tumors. NTP plans to conduct additional studies to learn more about how RFR might cause DNA damage. Please see the FAQs below for more information about the specific studies and NTP's cell phone RFR program.