

Re: Department of Health and Human Services - Request for Information on Electromagnetic Fields (EMFs), Radiofrequency (RF) Radiation, and Wireless Radiation Exposure

DECLARATION October 21, 2026

Quoting from an article at mdsafetech.org/problems/electro-sensitivity, "Abundant historical documentation of electro-sensitivity is revealed in the occupational and military literature since at least the 1930's, providing evidence this is a pathologic condition. There is also a growing body of peer reviewed science to support electro-sensitivity as a bona fide diagnosis accompanied by diagnostic biomarkers."

I, Michele A. Dubow, declare under penalty of perjury as follows:

I did not consent, nor do I consent today, to the continuous, involuntary exposure to pulsed, modulated, biologically active electrical/magnetic and radiofrequency/microwave (RF) radiation which, I believe, has harmed my health and day-to-day functioning and continues to do so. I urge the Agency to proactively and protectively consider the holistic and short/long term consequences to the health of ALL people and living creatures and systems on which we depend for life, ESPECIALLY the most sensitive such as children and those who are already ill or electro-sensitive.

I believe the research record is unmistakable and convincing in identifying unacceptable health effects going down to the cellular and subcellular level, as well as at the epidemiological level looking at populations such as military personnel, who have been exposed to various kinds of radiation for many decades, and that the evidence supports and demands appropriate regulatory action. (Other countries are WAY ahead of us in researching and acknowledging this, and not suppressing the information from the public the way it has been in the native English speaking countries.) You are literally in a position to set policy and precedents to prevent one possible reason life on this planet could decline or collapse. Won't you consider your own and your family's and descendants' wellbeing as well? Just because you personally may not actually, physically FEEL the effects of this radiation, many people do, or have otherwise been affected, and they/we/I are not freaks, weirdoes, or complainers. We are the canaries in the coal mine to which it is your responsibility to pay attention!

Due to my own physical health limitations at this time I am not able to be as comprehensive and scientifically reference based in these comments as I would prefer, so I will keep my remarks personal and conjectural based on my experience and understanding of growing research that supports a wider perspective for your consideration.

Symptoms of Electromagnetic Radiation (EMR) Syndrome (which happens to be recognized as a disability by the American Access Board and the European Union, I believe) are often listed to include headaches, dizziness, insomnia, irritability, depression, fatigue, and others including other neurological symptoms such as depression and anxiety. Research demonstrates immunological effects of numerous kinds and basic disruption to normal cell function. I assume inflammation and neuroinflammation are among the effects based on my very evident symptoms. Of course, these are common, nonspecific

symptoms, making it difficult to pin their exact cause. While I certainly have experienced each or all of these symptoms at times, and some of them are intractable and ongoing such as fatigue beyond the ordinary, what makes my claim compelling is that I (like others) can physically feel RF/microwave, electric and magnetic fields, and dirty electricity while I am being exposed at that moment, each in a slightly different feeling way, and there are characteristic effects such as, with RF, severe pain and pressure near my temples, across my forebrain, in my chest, etc., followed by the feeling of having been hit hard in the head or pierced through my ears with sudden inability to concentrate and focus, sudden intense fatigue, dizziness, malaise, heart palpitations, and irritability. This can happen when someone merely pulls out their cell phone and taps or talks in my presence. One phone is enough, especially a d**n iPhone! It happens frequently that I can easily detect the presence of RF sources without even seeing them or knowing of their presence. We can be driving down the road and I can tell you there is a cell tower nearby before we can see it; sure enough, around a curve or a short drive farther it appears! I once detected a satellite dish manufacturer located right off a highway exit in Maryland before exiting the road and seeing it. I often can't be in the room with a smart TV, even when it is "off."

What this means is that my world has grown very small. I carefully protect my home environment, manage my exposures as best as I can, and avoid most public places and traveling. I have not dared get on an airplane in 7 years! When I go to a hotel or beach rental, which is not often, I bring various protective fabrics to cover the emitting devices and unplug everything I can. I bring a meter and have to measure and negotiate with everyone. To go to the theater I have to wrap myself from head to toe in shielding fabric, and even that is not enough. I plead with friends to turn off their phones, especially inside a vehicle. I am essentially constantly exposed to a stream of pain and discomfort going about daily life. The checkout equipment at CVS's pharmacy desk and other stores can be brutal. Even my doctor's office is unpleasant, as there is now a powerful cell tower nearby in addition to the Wi-Fi and all the wireless devices. I get my teeth cleaned at the dentist's office the old fashioned way. This list seems endless.

I think I am doing better than many because I have had the liberty to focus full time on my health care and I am able to live in a restricted way. I also do a lot of research and take care with my practices, but that's not enough and I must do more. I have come to certain hypotheses about my sensitivity which I will share, pending further research, which I urge you to help make possible. I have not had a formal EMR Syndrome disability diagnosis (yet) because I don't know a physician who can do that and I have been too busy keeping myself afloat.

I live in North Carolina. I moved to NC almost 40 years ago to study Environmental Policy and Management at the University of North Carolina at Chapel Hill, where I received a Master of Science in Public Health degree and went to work as an environmental scientist, regulation developer, and policy maker at USEPA's Office of Air Quality Planning and Standards for almost 20 years until I was suddenly too ill to work and had to retire under medical disability because I developed Chronic Fatigue Syndrome (CFS). CFS is a poorly understood immune deficiency and nervous system dysregulation (neuropsychiatric and neurological) disease that presents with many symptoms that are the same as EMR Syndrome and, in my opinion, mild, chronic electric shock. CFS is now associated with something called "Cell Danger Response" which means your cells are too overwhelmed and hypervigilant to open

up and exchange with their environment. Sounds a lot like descriptions of EMR cellular effects! It is also referred to as Myalgic Encephalomyelitis which means muscle pain plus inflammation of the brain and spinal cord. It is considered a neurological illness of “unknown” origin.

More than 20 years ago in the early 2000s, as office and personal-use technology went through a tremendous expansion, I started suffering in mysterious ways when I was around equipment. For example, my EPA facility had a computer training classroom filled with computers and monitors. Whenever I spent time in that classroom I felt unexplainably nauseous and fatigued – knocked out. A few years later I had the poor fortune of being assigned an office without a window and I writhed in discomfort for months under the overhead fluorescent lighting. It was at that point that I suffered a collapse in my health. I was so fatigued, unable to concentrate, brain fogged, unable to use a computer, and even unable to drive, that I could no longer do my job, even at greatly reduced work hours, and I soon had to “retire” to release my FTE position. This was a devastating experience, needless to say.

While I cannot prove that those types of exposures “caused” my debilitation, I have had innumerable experiences since that directly correlate exposures to symptoms. Those experiences initiated an ongoing sensitivity to radiation exposures of many kinds. As the amount and intensity of excess and non-biologically appropriate radiation has increased, my sensitivity has increased and it has become a severely limiting restriction on where I can go and what I can do in the human environment. My health problems worsened for years, leaving me chronically debilitated and legally disabled. My physicians acknowledge that EMR is likely part of my health challenge but are not sufficiently knowledgeable about why I am so sensitive. I have various conjectures (hypotheses) about possible causes of my sensitivity that I will share to encourage your facilitation of research objectives. I need to do more personal research on these topics when I am able.

A number of years ago I testified at a NC Utilities Commission hearing on whether our local power provider, Duke Energy, should provide Smart Meter Opt Outs for customers. I am proud to have been one of the few people who testified in writing and in person, and I believe I am partly to credit for the decision to provide Opt Outs which are free for people with certain medical conditions. With my doctor’s waiver, Duke Energy not only did not put a Smart Meter on my home, they removed the meter on the home next door to me that is only about 10 to 15 feet away and faces my home. Within my home I use only wired and non-Smart technology and have rigorously controlled emissions from my Wi-Fi router so the measured RF in my home is usually very low and I can occasionally use my cell phone. I rarely use my cell phone for phone conversations and I keep it in airplane mode almost 100% of the time. (I will be devastated if/when my landline service is discontinued!!! I totally depend on it!!!)

Nevertheless, my home has other EMR problems that I either cannot correct or have been unable to correct so far, such as high background magnetic fields inherent to buried electrical cables. I also have dirty electricity issues which I am sure are health irritants. I once had the experience of my hands curling up involuntarily after the power came back on following an outage, just like the witch’s shoes and legs in the original Wizard of Oz movie! In my mind, that is a symptom of noncontact electrocution.

An article I read says people who experience electric shock may experience a variety of symptoms including neuropsychological and physical symptoms such as Post Traumatic Stress Disorder (which I am also diagnosed with, among others), depression, anxiety, insomnia, reduced attention span, flashbacks, memory loss, concentration difficulties, tingling sensations, fainting, loss of balance, weakness, pain, fatigue, headaches, night sweats, muscle spasms, and stiff joints. The article goes on to say that several factors can affect the severity of “injuries” including the intensity of the current, the type of current, which part of the body the current reaches, how long a person has exposure to the current, and resistance to the current.

I am intrigued because of the similarity of these symptoms and the factors that affect their severity with the symptoms of EMR Syndrome, with the types of symptoms that MANY, MANY people in our society and around the world are experiencing regardless of diagnoses (which are often attempts to categorize without true understanding of functional causes), and because this hints at the overlay of exposures to which we are subject all the time, heightening the cumulative effects and risks, both short and long term. Since biological systems such as human beings are electromagnetic by our very nature, which is being demonstrated more and more every day by fascinating research, how could we not be influenced by natural and artificial electromagnetic frequencies, especially ones known not to be in harmony with our evolutionary adaptation? The question I have is not why or how but why or how so many people claim NOT to feel this the way I do? Contrary to their or your take on it, I happen to believe my sensitivity is a superpower and I joke that I am like the Hubble telescope! I am more apparently abled, not disabled, so to speak.

(I also know from experience and learning that people are capable of influencing other electromagnetic beings, such as other people, animals, plants, and even inanimate machines such as clocks, washing machines, automobiles, computers, and much else.)

The vagus nerve begins in the brainstem and controls autonomic nervous function. It exits from the brainstem and innervates most of the organs of the body, transferring information in both directions. The cerebral cortex is “upstream” from the vagus nerve and signals it to react. If one has had a head injury, the brain’s output to the vagus nerve can be reduced, leading to organ function issues. In addition, the gut microbiome, which is essentially our immune system, is inexorably affected by not only the vagus nerve’s signals but also by all the stress neurochemistry in our body, leading to myriad dysfunctions and now even connected with neurological illnesses such as Parkinson’s and Alzheimer’s. I have had several significant Traumatic Brain Injuries and it is possible the after effects have influenced my EMR sensitivity as well as my overall health including my microbiome (which was also negatively affected by antibiotic use, as it is for so many people). I may have structural as well as functional damage and/or chronic brain inflammation that increase my sensitivity. EMR is a huge (additional) stressor! Think how many people must have the same preconditioning factors. A vicious cycle ensues.

Medical grade implants are made of various alloys. The dental implant in my jaw is made from a titanium alloy that contains 6% aluminum and 4% vanadium, both of which are highly electrically conductive metals and both of which are known to leach ions into the brain. In addition, a former “biological” dentist I consulted with strongly recommended I remove the implant because “it is like

having an EMR antenna in your head.” (Unfortunately, I can’t remove the implant without destroying my jaw.) Most people, even if they don’t have dental implants, have various kinds of metal in their mouth which cause a galvanic, or battery like, electrical flow which can also be exacerbated by exogenous frequencies. And we all have a variety of heavy metals lodged in our bodies and brains.

Sharks are highly sensitive to magnetic fields, primarily due to their electrosensory organs called ampullae of Lorenzini, which can detect small variations in electric potential and may also perceive magnetic fields through electromagnetic induction. This ability helps them navigate and locate prey in the ocean. Similarly, birds navigate using the Earth’s magnetic field through a process called magnetoreception, which literally allows them to see magnetic fields, allowing them to migrate over long distances. Birds use magnetite, an iron oxide mineral, as part of their navigational system. It is found in specific cells and acts like a tiny compass needle. Humans also have tiny magnetite crystals in our brains. I propose that humans may operate on a continuum of sensitivity and perception to EMR, perhaps based on natural biological variation in the presence of certain metals or minerals or other (perhaps as yet undiscovered) sensory organs, structures, or processes. It is well known anatomically and physiologically that we are not one-size-fits-all in our form or functionality. Perhaps some people, such as me, are just naturally more sensitive, and that does not make us BAD! It makes us worthy of protection and extra consideration as with any other recognized “disability.” I am excited to learn that sharks have sensors for magnetic fields so I can find out how I sense them. Or, perhaps I have more magnetite than typical in my brain. (I have an excellent sense of direction.)

The latest science shows the two way interaction between EMR and mold, as another example. EMR exposure seems to make molds more virulent and release more mycotoxins which themselves can cause cancer and many of the symptoms I have already listed. Our homes and food supply are rife with toxic mold and many people have poor genetics for detoxification. Mold illness, on the other hand, seems to exacerbate sensitivity to EMR. (Perhaps the people are feeling what the mold inside them is feeling.) Mold illness, at the least, increases systemic inflammation and is a serious threat to the immune, metabolic, and endocrine systems. Could this be another mechanism by which EMR has affected me and can affect us generally?

We must consider the effects of individual genetics, nutrition, psychosocial factors, prior medical history including TBI and other injuries, prior cumulative exposures of all kinds, composition and health of the microbiome, exposure to molds and mycotoxins, and many other factors in trying to understand the FACT that and the mechanisms by which many people and a growing number worldwide are increasingly sensitive to EMR exposure, especially RF which is ubiquitous, unavoidable, and increasingly treacherous. In the meantime, before this information is available in a practical way, you have the opportunity to establish new exposure limits and other regulations that rely on the already existing and substantial science and experience that scream for a level of protection far beyond what currently exists. The time is NOW, not when everyone and everything on Earth is decrepit or dead! This is common sense. (And we haven’t even considered our fellow plants, animals, insects, reptiles, birds, fungi, or the Earth itself.)

At the time I was working for the Federal government, it was considered reasonable and respectable, honorable even, to act in favor of the public's and the environment's health with the understanding that this IS the Agency's mission, and for GOOD REASON, let alone that it is the law!

How can I or we as a society outrun the overbearing intrusion of literally life-threatening radiation exposure that is truly not necessary, and is, indeed, dangerous to our life, liberty, and happiness? How can any one individual do enough to protect themselves without your help?

I am sincerely grateful for the opportunity to share personal experiences and reflections. Thank you for sincerely considering them with compassion and wisdom to craft a long-term, enduring public policy that is kind, wholesome, and sustainable.

EVERYTHING is connected! It is time we act like it is.

Michele A. Dubow