

Supporting References

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October 21, 2026 | Response to Questions 5, 8, 9 and 11
HHS RF/EMF Request for Information | Docket HHS-OASH-2026-0397

These selected references accompany my request for stronger consumer protections, representative exposure testing, transparent assessment of the scientific evidence, and enforceable manufacturer accountability. Each entry identifies its specific relevance to the comment.

Exposure standards, testing and children

1. Origin of the FCC exposure framework

Federal Communications Commission. Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation. Final rule, FCC 96-326. 61 FR 41006-41019, August 7, 1996.

Relevance: Documents the 1996 adoption of the RF-exposure framework, including localized absorption limits for portable transmitters. Supports the historical statement in my comment. The age of the limits and the adequacy of current testing are distinct questions; this reference does not imply that every testing procedure has remained unchanged since 1996.

[Official Federal Register rule \(GovInfo\)](#)

2. Phones carried close to the body

French Agency for Food, Environmental and Occupational Health & Safety (ANSES). Exposure to mobile telephones carried close to the body. Official agency statement, October 21, 2019; associated expert appraisal, Request No. 2017-SA-0229.

Relevance: Examines exposure from phones carried close to the body and the importance of the separation distance used in testing. Provides an agency assessment directly relevant to my request that compliance testing address foreseeable body contact and disclose test conditions.

[ANSES official statement](#)

[ANSES expert opinion, English PDF](#)

3. Children and protective exposure assumptions

ANSES. Opinion on exposure of children to radiofrequencies. Request No. 2012-SA-0091, June 20, 2016.

Relevance: The recommendations include reconsidering reference levels for environmental RF exposure in the context of children's protection. This supports explicitly examining children in protective requirements. Environmental reference levels and localized device SAR limits are different measures and should be assessed accordingly.

[ANSES opinion, English PDF](#)

[ANSES summary of its recommendations](#)

Experimental evidence

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The studies below are relevant to the request for a transparent evaluation of existing evidence. Their findings are identified by study population and exposure conditions. The inclusion of differing outcomes supports applying consistent evidentiary standards.

4. National Toxicology Program rat study

National Toxicology Program. Technical Report 595: Toxicology and carcinogenesis studies of whole-body 900 MHz GSM- and CDMA-modulated radiofrequency radiation in Sprague Dawley rats (title abbreviated). November 2018. DOI: 10.22427/NTP-TR-595.

Finding and relevance: NTP concluded there was "clear evidence" of carcinogenic activity in male rats, based on malignant heart schwannomas under the tested conditions. Female-rat findings were classified as equivocal. This provides experimental evidence for HHS to consider in its assessment. Whole-body animal exposures do not directly quantify risk from ordinary human phone use.

[NTP report abstract, conclusions and full-report link](#)

<https://doi.org/10.22427/NTP-TR-595>

5. Ramazzini Institute lifetime rat study

Falcioni L, et al. Report of final results regarding brain and heart tumors in Sprague-Dawley rats... (title abbreviated). Environmental Research. 2018;165:496-503. DOI: 10.1016/j.envres.2018.01.037.

Finding and relevance: In rats exposed from prenatal life until natural death to a 1.8 GHz GSM field, investigators reported significantly more heart schwannomas in males at 50 V/m, the highest tested field strength. This finding informs long-term exposure assessment; it does not directly estimate human risk. **Disclosure:** Authors reported no conflicts and no direct funder role in the study or publication. The published funding list includes public agencies, foundations and other organizations.

[PubMed bibliographic record and abstract](#)

<https://doi.org/10.1016/j.envres.2018.01.037>

[Published article, including funding disclosure \(copy hosted by Legambiente\)](#)

6. Recent experimental context with a different outcome

Kim HS, et al. The International Collaborative Animal Study of the carcinogenicity and genotoxicity of mobile phone radiofrequency radiation: the Korean study. Toxicological Sciences. 2026;209(3):kfag001. DOI: 10.1093/toxsci/kfag001.

Finding and relevance: This study reported no statistically significant increase in tumor incidence and no genotoxic effects in male rats under its 900 MHz CDMA, 4 W/kg whole-body exposure protocol. It is included as relevant context for evaluating the animal evidence. HHS should assess differences in protocols, study sensitivity and outcomes transparently alongside findings of adverse effects.

[PubMed bibliographic record and abstract](#)

<https://doi.org/10.1093/toxsci/kfag001>

International context

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The following sources add Israeli research and examples of protective policy. Funding disclosures, study findings and government recommendations are identified separately. A country of origin alone does not establish scientific independence.

7. Israel: nationwide parotid-gland tumor study

Sadetzki S, et al. Cellular Phone Use and Risk of Benign and Malignant Parotid Gland Tumors: A Nationwide Case-Control Study. *American Journal of Epidemiology*. 2008;167(4):457-467. Published online December 6, 2007. DOI: 10.1093/aje/kwm325.

Finding: The study of 460 cases and 1,266 controls found no increased risk for regular use overall, but elevated odds in some heavier-use and same-side-use analyses. These observational associations do not establish causation. **Funding:** European Commission, UICC and Israel Cancer Association. UICC received contributions from the Mobile Manufacturers' Forum and GSM Association; the paper states that agreements guaranteed scientific independence. It should not be described as free of industry-derived funding.

[Publisher record and abstract](#)

[Published article, funding disclosure on p. 465 \(copy hosted by Environmental Health Trust\)](#)

8. Switzerland: additional precautionary installation limits

Swiss Federal Office for the Environment (FOEN). *Electrosmog: In brief*. September 5, 2025; section "Protection against electrosmog (limit values)."

Policy relevance: FOEN describes additional, significantly stricter precautionary requirements for stationary installations, alongside general exposure limits. This provides an example of precaution implemented through enforceable exposure requirements. These are installation requirements, not handset SAR limits, and should not be presented as a directly comparable national phone-SAR standard.

[FOEN official explanation of exposure protection and precaution](#)

9. Israel: precautionary advice for children

Israel Ministry of Health. *Screen Use in Elementary School-Aged Children*. September 7, 2026; section "Cell Phone Radiation and Children's Health in School Age."

Policy relevance: The Ministry recommends a precautionary approach for children, including wired headphones or speaker calls and reducing exposure. This is public-health guidance, not an experimental study or a legally lower handset SAR limit. It supports consideration of child-specific protective measures.

[Israel Ministry of Health guidance](#)

Enforcement and accountability

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These official French sources document market surveillance, corrective measures for SAR noncompliance, and mandatory consumer disclosures. They support the request for protection that continues after a device enters the market.

10. France: corrective action, market withdrawals and recalls

Agence nationale des frequences (ANFR). Resultats 2025 des controles de surveillance du marche des terminaux mobiles. May 2026. See the summary on pp. 3-4 and the surveillance procedure on p. 5. French-language official report.

Documented action: The report records software updates for four handset models and market withdrawal and recall of five models following exceedances of applicable SAR limits. It separately identifies eight models withdrawn and recalled for administrative noncompliance. ANFR describes unannounced sampling from retail outlets and warehouses, testing by accredited laboratories, and publication of results after control procedures conclude. **Relevance:** This is a concrete precedent for post-market testing, public reporting and corrective action. It supports the enforcement recommendation in my comment; it is not a numerical comparison of French and U.S. exposure limits.

[ANFR official 2025 surveillance report, published May 2026 \(PDF\)](#)

11. France: mandatory SAR information for consumers

ANFR. Surveillance du marche des equipements radioelectriques: Directive RED. July 2020, p. 3. Explains Decree No. 2019-1186 of November 15, 2019 and related disclosure requirements, expanded from July 1, 2020.

Requirement and relevance: For covered radio equipment, SAR values and precautions must accompany the product and appear in its instructions; SAR values must also be displayed at points of sale. The guidance identifies equipment transmitting above 20 mW that can reasonably be expected to be used within 20 cm of the body. For phones used at the ear, near the body or in the hand, it specifies head, trunk and limb SAR disclosures. This provides an official example of mandatory exposure information that consumers can inspect before purchase.

[ANFR official RED market-surveillance brochure, p. 3 \(PDF\)](#)

[Decree No. 2019-1186, official French legal publication](#)

[ANFR explanation of the July 1, 2020 disclosure expansion](#)