



October 21, 2026

Office of the Assistant Secretary for Health
U.S. Department of Health and Human Services
Submitted electronically via [regulations.gov](https://www.regulations.gov)

Re: Docket HHS-OASH-2026-0397, Request for Information on Electromagnetic Fields (EMFs), Radiofrequency (RF) Radiation, and Wireless Radiation Exposure, 91 FR 59792 (September 21, 2026)

To the Office of the Assistant Secretary for Health:

Protection of the Educational Rights of Kids (PERK) is a California parent organization that works on the educational and medical rights of children. We submit this comment in response to the Department's request for information, and we thank the Department for opening this question to the public.

Our position is narrow. Children in American public schools and licensed child care spend six to seven hours a day inside wireless infrastructure their parents were never told about and never asked to approve. They cannot leave it, and they cannot turn it off. By the government's own account, the questions about children, schools, and long-term exposure remain open. When the question is open, the decision belongs with the parent, and a parent cannot decide without information.

The attached paper responds to Questions 2, 5(n), 9, 11(a), 12, 13(c), 15(a), 16, and 17 as numbered in the notice. It asks the Department to:

1. Issue a disclosure format that schools and licensed child care providers can post for parents (Question 9).
2. Issue practical exposure-reduction guidance for schools and child care providers (Question 5(n)).
3. Fund a national study of RF levels in occupied American classrooms and child care rooms (Question 16).
4. Coordinate with the Department of Education and the FCC so that schools receiving E-Rate funds disclose installed wireless equipment to parents (Question 17).

PERK also offers to run a wireless version of the parent survey behind our September 2026 filings in Docket HHS-OS-2026-0332, and to provide the results to the Department.

Every factual claim in the attached paper is cited to a primary source. This comment contains no personally identifiable or personal health information.

Respectfully submitted,

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Prepared by Rebekah Ricks, Senior Consultant, PERK (Rebekah@PERK-GROUP.com)

Attachment: Wireless Exposure in Schools and Child Care Settings

Wireless Exposure in Schools and Child Care Settings

Comment of Protection of the Educational Rights of Kids (PERK) in Docket HHS-OASH-2026-0397

October 21, 2026

Before the U.S. Department of Health and Human Services, Office of the Assistant Secretary for Health.

Re: Docket HHS-OASH-2026-0397, Request for Information on Electromagnetic Fields (EMFs), Radiofrequency (RF) Radiation, and Wireless Radiation Exposure, 91 FR 59792 (September 21, 2026), FR Doc. 2026-19252. Comments must be received no later than October 21, 2026, as printed in the notice.

Submitted by: Protection of the Educational Rights of Kids (PERK), Amy Bohn, President, California. Prepared by Rebekah Ricks, Senior Consultant. Contact: abohn@perk-group.com; Rebekah@PERK-GROUP.com.

Response to Question 2 (perspective). This comment represents a parent-led organization, which the notice lists as “another type of organization or perspective,” and the families and caregivers of school-age children it serves. It rests on government notices and reports, a federal court decision, statutes, and our own survey work. Where it touches exposure science it names the source, claims no more than the source says, and leaves the biological evidence to commenters qualified to present it.

1. Summary

Children in American public schools and licensed child care spend six to seven hours a day, roughly 180 days a year, inside wireless infrastructure that their parents were never told about and never asked to approve. They cannot leave. They cannot turn it off. That is the parent side of this docket, and it does not depend on how the science comes out.

The federal record on the science is unsettled by the government’s own account. The FCC’s exposure limits date to 1996 and the Commission still stands on them (91 FR 60128). The D.C. Circuit held in 2021 that the FCC had not given a reasoned explanation for why those limits protect children or account for long-term exposure and the spread of wireless devices (*Environmental Health Trust v. FCC*, 9 F.4th 893, 908-10, 914 (D.C. Cir. 2021)). The FDA’s 2020 literature review addressed cancer only. This notice itself says public concern has risen, particularly around children, schools, and long-term cumulative exposure (91 FR 59792). When the government cannot say the question is closed, the decision belongs with the parent, and a parent cannot decide without information.

We ask HHS to do three things.

1. Answer Question 9 by naming the information schools and child care providers should disclose to parents and local governments: an inventory of wireless transmitters in each classroom, when they operate, and how a family can request a lower-exposure placement.
2. Answer Question 16 by funding the measurement that does not exist in the United States: a national study of actual RF levels in classrooms and child care rooms during the school day, and a survey of parents on notice and consent, using the instrument described in Section 7 below.
3. Answer Question 17 by coordinating with the Department of Education and the FCC so that schools receiving E-Rate funds for classroom Wi-Fi tell parents what was installed.

A model school board policy that does all three at the district level is available from the undersigned on request.

2. Who we are and why parents are filing

PERK, Protection of the Educational Rights of Kids, is a California parent organization led by Amy Bohn. In September 2026 PERK filed two papers with this Department: A Presumption for Liberty, on religious exemptions and informed consent, built on a survey of 664 parents, and Too Late to Be Made Whole, on public employees and after-the-fact remedy, both in Docket HHS-OS-2026-0332. PERK also delivered Fixing Right to Try to Secretary Kennedy.

This comment was prepared for PERK by its Senior Consultant, Rebekah Ricks, a legislative strategist with more than twenty years of experience and more than forty bills enacted in seven states, who represented PERK at the Gathering described below.

On October 12 through 14, 2026, twenty-six women from twenty-eight organizations met at the MAHA Center in Washington, D.C., for the Gathering of America's Mothers. The organizations span the political spectrum. They adopted a joint letter to Congress with twenty-four asks, every one unanimous. Ask 8 addresses wireless exposure in schools and child care settings: it asks that children be protected from EMF and wireless radiation exposure in schools and child care settings, with community notice before new wireless infrastructure is sited. This comment carries Ask 8 into the federal record.

We file as parents, not as scientists. Our claim is narrow: where the law has chosen to address what is done to a child at school, it requires that parents be told, and usually that they consent. Florida requires a parent's written authorization before a school gives a child prescribed medication, and recognizes a parent's right to consent in writing before a biometric scan of the child or a government voice or video recording of the child, subject to statutory exceptions (ss. 1006.062(1)(a) and 1014.04(1)(g) and (i), Fla. Stat.). Federal law requires parental consent before a student must complete certain federally funded surveys on protected subjects such as religious beliefs or family income, and gives notice and opt-out rights for others (20 U.S.C. 1232h). Wireless transmitters were installed in those same classrooms with no notice at all.

3. What changed in the classroom since 1996, and who was told

The FCC adopted its RF exposure limits in 1996 (47 CFR 1.1310 and 2.1093). By the Commission's own description in this year's notice, those limits rest on guidance from the National Council on Radiation Protection and Measurements and from ANSI and IEEE, and the Commission has kept them in force since (91 FR 60128). The first IEEE 802.11 wireless local area network standard was published in 1997, the year after the limits were set. The classroom wireless network did not exist as a standard when the limits were written.

Three things then happened.

1. The federal government paid for classroom Wi-Fi. In 2014 the FCC rewrote the E-Rate program to fund internal connections, including wireless networks inside school buildings, through Category Two budgets (FCC 14-99; 47 CFR 54.502). USAC lists routers, switches, wireless access points, and cabling as the equipment Category Two pays for, and publishes the commitments by funding year in its open data (USAC, E-Rate Eligible Services Overview; USAC Open Data, FRN Status dataset qdmp-ygft).
2. Schools put a wireless device in each child's hands. One-to-one device programs became the norm in K-12: in the 2024-25 school year, 88 percent of public schools reported a one-to-one program that gives every student a school-issued device (National Center for Education Statistics, School Pulse Panel, release of February 19, 2025). A child in such a classroom is within arm's reach of a transmitting device for most of the instructional day and in the same room as

the access point that serves it; the School Board of Broward County, Florida, for example, sets a standard of one wireless access point per classroom.

3. States began to regulate the student's device but not the district's. Florida now bars elementary and middle school students from using wireless communications devices during the entire school day, and high school students during instructional time, with a six-district pilot of full-day bans and a Department of Education report due December 1, 2026 (s. 1006.07(2)(f), Fla. Stat., as amended by HB 1105, effective July 1, 2025). The state treats the child's phone as a matter for public policy. The district's own access points, which transmit whether or not the phones are off, are not addressed in that statute, and we are aware of no Florida statute or State Board rule that requires a district to tell parents what wireless infrastructure operates in a classroom: we searched chapters 1001 through 1013 of the Florida Statutes and chapter 6A of the Florida Administrative Code and found none.

The federal program that paid for the Wi-Fi does require public notice, but only about content. A school that takes E-Rate money must adopt an internet safety policy and give the public notice and at least one hearing on it (47 U.S.C. 254(l)(1)(B)). There is no corresponding notice about the equipment itself: what was installed, where it is located, or whether it transmits when it is not in use for instruction. Parents are asked what their children may see on the network and nothing about what the network emits.

The D.C. Circuit named this gap in 2021. The court sent the FCC's 2019 decision back for a reasoned explanation on, among other things, "the ubiquity of wireless devices, and other technological developments" since the guidelines were last updated, and on the impacts of RF radiation on children (*Environmental Health Trust v. FCC*, 9 F.4th 893, as quoted at 91 FR 60128). The FCC did not answer for five years. It reopened the record, while a petition for a writ of mandamus filed by Children's Health Defense and others was pending in the D.C. Circuit (*In re Children's Health Defense*, No. 26-1121; order of August 26, 2026 directing the Commission to respond within 30 days), with a Public Notice released September 17, 2026, four days before this Department's notice was published.

4. Response to Question 9: what should be disclosed to schools, parents, and local governments

Question 9 asks what technical and exposure-related information should be disclosed to consumers, residents, workers, schools, healthcare providers, and local governments (91 FR 59792). Our answer for schools and child care providers is a disclosure parents can read in five minutes, posted where the school posts its other notices, and updated whenever the equipment changes.

1. Inventory. The number and location of wireless access points, cellular small cells, distributed antenna systems, and any other fixed transmitter on campus, listed by building and by classroom.
2. Operating schedule. Whether each access point transmits continuously or is switched off when it is not in use for instruction, and who controls the switch.
3. Device practices. Whether the school runs a one-to-one device program, whether student devices connect by Wi-Fi during instruction, whether a wired option exists, whether student devices are permitted on laps or against the body during instruction, and any school rule governing that practice.
4. Measurements. Any RF measurements taken in the building, the method, the date, and the results, or a plain statement that none have been taken.
5. Alternatives. Whether any classroom is wired rather than wireless, and the procedure by which a parent can request a lower-exposure placement for a child.
6. A contact. The name of the district employee who can answer questions about the above.

This is not a request for technical data a parent cannot use. It is a request for the same category of information the law already requires for medication, biometric scans, and certain federally funded surveys: what is being done, when, and what alternatives exist.

Two governments have already written practices of this kind into law or official recommendation, and two states have put the question to study.

- France. Article 7 of Law No. 2015-136 of February 9, 2015 prohibits wireless internet equipment in the spaces of child care facilities used by children under three, and requires that wireless access in primary school classrooms be deactivated when it is not in use for digital teaching activities (Journal Officiel No. 34, February 10, 2015). The same article requires that every new installation of a radio network in a primary school be preceded by information to the school council: “toute nouvelle installation d’un réseau radioélectrique fait l’objet d’une information préalable du conseil d’école” (Légifrance, LEGIARTI000030214114).
- Maryland. The Maryland Children’s Environmental Health and Protection Advisory Council, a body created by state statute, adopted a report on December 13, 2016 recommending that the State Department of Education advise local school systems to consider wired devices, including wired LAN connections, as an alternative to active classroom Wi-Fi, to consider a switch that shuts the router down when not in use, to teach children to turn Wi-Fi off when it is not being used, and to share the report with teachers and parents. The council also recommended that the state’s health department ask this Department to petition the FCC to revisit the exposure limit, and that the report be shared with this Department and the FCC (Maryland CEHPAC, Wifi Radiation in Schools in Maryland, Final Report, December 13, 2016, pp. 8-9).

Oregon’s SB 283 (2019), Oregon Laws 2019, chapter 677, directed the Oregon Health Authority to review independently funded, peer-reviewed studies of health effects from microwave radiation, particularly wireless network technologies in schools, and directed the Department of Education to develop recommendations to schools on practices and alternative technologies. New Hampshire’s HB 522 (2019), Chapter 260, Laws of 2019, created a commission to study the environmental and health effects of evolving 5G technology; its final report of November 1, 2020 recommended that schools and public libraries use hardwired connections instead of Wi-Fi for computers and laptops. Neither state has enacted a classroom mandate. Both treated the question as one for public policy, decided in public.

For local governments, the disclosure that matters is siting. Parents cannot learn from any federal source how many cellular transmitters sit within a given distance of a school or a licensed child care facility. No federal dataset reports that count. The FCC’s Universal Licensing System and Antenna Structure Registration hold license and structure records that a researcher could map against school locations, but they are not a published count, and they do not list unlicensed Wi-Fi equipment at all (47 CFR part 15). Local review of small wireless facilities is also limited by the FCC’s 2018 rules, which set shot clocks and presumptions for local approval (FCC 18-133; 47 CFR 1.6003). HHS should say, in its summary of this docket, that local governments and school boards need a transmitter inventory within a defined radius of each school and child care facility, and should ask the FCC how that inventory can be produced from existing licensing and antenna registration data.

5. Responses to Questions 11(a), 12, 13(c), and 15(a)

Question 11(a) asks whether exposure assessment or risk evaluation should differ for children. Yes, and for a reason that does not require resolving the science. A child in a public school or a licensed child care room does not choose the exposure, cannot leave it, and is in it for most of the waking day across the years when the body is growing. An adult with a phone can put it down. The American Academy of Pediatrics told the FCC in a letter of August 29, 2013 in ET Docket No. 13-84 that exposure limits should

account for the use of wireless devices by vulnerable children and pregnant women. The D.C. Circuit noted those comments in 2021 and held that the FCC's reliance on a conclusory statement from the FDA did not meet the Administrative Procedure Act's requirement of a reasoned explanation (*Environmental Health Trust v. FCC*, 9 F.4th at 908-10). The court took no position in the scientific debate; its holding was that the agency had not explained itself. We make the same distinction here.

Question 12 asks what evidence exists on adverse effects below the current federal limits. The parent side is this: the government's own answer is incomplete by its own admission. The FCC found in 2019 that the evidence did not support changing the limits (91 FR 60128). The FDA's 2020 literature review examined cancer endpoints only and concluded the evidence was insufficient to support a causal association with tumors (FDA, Review of Published Literature between 2008 and 2018). The court faulted the FCC for failing to explain its treatment of the evidence on non-cancer effects. The largest federal animal studies of RF exposure are the National Toxicology Program's Technical Reports 595 and 596 of November 2018, on rats exposed at 900 MHz and mice exposed at 1,900 MHz with cell-phone modulations; NTP's current research page lists the program's status as completed. We leave the reading of those studies and the post-2019 literature to commenters qualified to present it. When the question is open, the burden of silence should not fall on the family.

Question 13(c) asks how Wi-Fi affects cumulative exposure patterns. The one government measurement study of classroom Wi-Fi we have found was done abroad: Australia's radiation regulator, ARPANSA, measured 23 schools in Victoria and New South Wales during school hours and reported typical classroom Wi-Fi exposure at 0.0002 percent of the Australian standard (Karipidis et al., *Radiation Protection Dosimetry* 175(4):432-439 (2017)). No federal agency has done the same in an American classroom. Whether an access point transmits when no one is using it is a configuration choice: school network controllers in common use support scheduled availability and room-by-room control as standard features (Cisco Meraki, SSID Availability documentation). From the parent side, classroom Wi-Fi is the one source a family cannot control and cannot see. Florida's phone law shows that a state can and will regulate wireless use at school when it decides the policy reason is strong enough (s. 1006.07(2) (f), Fla. Stat.). The district's infrastructure deserves the same status: a policy choice, made in public, with parents told.

Question 15(a) asks what evidence should be considered on proximity to homes, schools, childcare facilities, healthcare facilities, and workplaces. For schools and child care, HHS should consider three things: measured exposure in the rooms children occupy, not modeled exposure at the property line; the number of transmitters within a defined radius of each facility, which no agency now reports; and the age of the children, since France drew its line at age three for a reason (Law No. 2015-136, art. 7).

6. Responses to Questions 5(n), 16, and 17: what the federal health agencies should change

Question 5(n) asks what scientific, technical, or regulatory changes by federal health agencies would improve the assessment, disclosure, and regulation of wireless radiation exposure. (The notice numbers this item as sub-item n under Question 5; we use the numbering as printed.) We propose three changes that this Department can make without waiting for the FCC.

1. Issue practical guidance for schools and child care providers. The notice says HHS wants practical strategies to reduce unnecessary exposure where appropriate (91 FR 59792). The Maryland council's 2016 recommendations and France's 2015 statute are the two existing models: wired connections where practical, access points off when not in use for instruction, devices off the body, and no wireless equipment in rooms for the youngest children. HHS

guidance of this kind commits no agency to a health finding. It tells a principal what to do on Monday.

2. Set a disclosure standard. The six items under Question 9 above, issued as a recommended notice format that a school or licensed child care provider can post. FDA's radiation-emitting products authority under the Radiation Control for Health and Safety Act of 1968 (Pub. L. 90-602; 21 U.S.C. 360hh et seq.) already supports consumer information on electronic products; HHS should state whether that authority reaches disclosure for wireless access points marketed to schools. The statute defines electronic product radiation to include non-ionizing electromagnetic radiation emitted from an electronic product (21 U.S.C. 360hh), and we found no FDA guidance directed to wireless access points; FDA's RF wireless guidance addresses medical devices only (FDA, Radio Frequency Wireless Technology in Medical Devices, August 2013).
3. Ask the FCC and the Department of Education to condition E-Rate Category Two funding for internal connections on parent notice. The statute already requires public notice and a hearing on the internet safety policy (47 U.S.C. 254(l)(1)(B)). A one-page equipment disclosure at the same hearing costs nothing.

Question 16 asks for the highest priority research gaps. From the parent side the gaps are about measurement and consent, not mechanism.

- A national measurement study of RF levels in the rooms children actually occupy, across a representative sample of public school classrooms and licensed child care rooms, during the school day with devices in use. No federal agency has published such a dataset; the only government classroom measurement study we have found is ARPANSA's 2017 study of 23 Australian schools, described above.
- A test of whether the practical strategies in item 1 above lower measured exposure. This is the notice's own Question 5(o).
- A parent survey on notice and consent, described in Section 7 below.
- A school exposure history for the children in any long-term cohort HHS funds, so that years in a wireless classroom can be analyzed as a variable.
- Toxicology. The National Toxicology Program ran the largest federal animal studies of RF exposure and published them in November 2018 (Technical Reports 595 and 596). NTP's current research page lists the program's status as completed. HHS should say whether that program will resume.

Question 17 asks how federal health agencies can improve coordination and what roles FDA, NIH, and CDC should play.

- FDA: the school and child care guidance and the disclosure format in items 1 and 2, and a statement of its electronic product authority over access points.
- NIH: fund the classroom measurement study and the strategy test, and decide the future of the NTP program.
- CDC: add questions on wireless infrastructure, device practices, and parent notice to its school health surveillance. Neither the 2024 School Health Profiles questionnaires nor the School Health Policies and Practices Study, last fielded at the district level in 2016, asks about wireless infrastructure, transmitter placement, RF measurement, or parent notice.
- Across the Department: a standing channel with the Department of Education and the FCC, because the exposure is in schools, the money is E-Rate, and the limits are the FCC's. No single agency owns the classroom, which is how nobody came to ask the parents.

7. The parent survey method, and what a wireless survey would measure

PERK's September 2026 filing, *A Presumption for Liberty*, rests on a survey of 664 parents on how they experience vaccine recommendations: who delivered the recommendation, what was said, whether declining was presented as an option, and whether the parent believed the decision was theirs. That survey is about vaccines. It supplies the method for this docket, not the data, and we make no claim about parents' experience of wireless exposure until the survey runs.

The instrument transfers with the subject changed. The wireless version asks a parent: Were you told what wireless equipment operates in your child's classroom? By whom, and in what form? Did you know you could ask? Did anyone offer a lower-exposure option? If you asked, what happened? Do you believe the decision about your child's exposure at school is yours? The questions measure notice and consent, which is the subject of Question 9, and they produce a number HHS does not have.

We offer to run the wireless version with partner organizations across multiple states, and to provide the results to the Department in whatever form it designates, since the comment period closes October 21. The instrument is available to the Department on request.

8. Recommendations and conclusion

1. Disclosure (Question 9). Issue the six-item school and child care notice format described above, as a recommended standard.
2. Guidance (Question 5(n)). Issue practical exposure-reduction guidance for schools and child care providers, built on the Maryland 2016 recommendations and France's 2015 statute.
3. Measurement (Question 16). Fund a national study of RF levels in occupied classrooms and child care rooms, and a test of whether the guidance lowers them.
4. Coordination (Question 17). Open a standing channel with the Department of Education and the FCC, and ask that E-Rate Category Two recipients post the equipment disclosure at the internet safety hearing the statute already requires.
5. The parent finding. State in the Department's summary of this docket that schools and child care facilities are settings of involuntary, long-duration exposure for children, and that disclosure to parents is warranted on that basis whatever the outcome of the scientific review.

The argument of this comment is older than the technology. A government that puts something in a room with other people's children, something that transmits whether or not the children are using it, owes those people the facts and the choice. Nobody asked the parents in 2014 when the money went out, or in 2019 when the FCC closed its inquiry, or in the five years the court's remand sat unanswered. This Department has now asked. This is our answer, and we will bring the parents' own answers when the survey is run.

Sources

Primary sources only, accessed October 19 to 21, 2026.

1. U.S. Department of Health and Human Services, Request for Information on Electromagnetic Fields (EMFs), Radiofrequency (RF) Radiation, and Wireless Radiation Exposure, 91 FR 59792 (September 21, 2026), FR Doc. 2026-19252, Docket HHS-OASH-2026-0397. Notice. Docket.
2. Federal Communications Commission, FCC Seeks Comment on RF Exposure Issues Subject to D.C. Circuit Remand in *Environmental Health Trust v. FCC*, Public Notice DA 26-997, ET Docket No. 13-84 (released September 17, 2026), summarized at 91 FR 60128 (September 22, 2026), FR Doc. 2026-19364. Federal Register summary. Full notice.

3. Environmental Health Trust v. FCC, 9 F.4th 893 (D.C. Cir. 2021).
4. 47 CFR 1.1310 (radiofrequency radiation exposure limits); 47 CFR 2.1093 (portable devices).
5. Federal Communications Commission, Resolution of Notice of Inquiry, Second Report and Order, Notice of Proposed Rulemaking, and Memorandum Opinion and Order, ET Docket Nos. 03-137, 13-84, and 19-226, FCC 19-126 (released December 4, 2019), 34 FCC Rcd 11687 (2019).
6. Federal Communications Commission, Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation, ET Docket No. 93-62, Report and Order, 11 FCC Rcd 15123 (1996), exposure limits at 15135-52, paras. 28-74.
7. U.S. Food and Drug Administration, Center for Devices and Radiological Health, Review of Published Literature between 2008 and 2018 of Relevance to Radiofrequency Radiation and Cancer (February 2020). Report.
8. National Toxicology Program, Technical Report 595, Toxicology and Carcinogenesis Studies in Hsd:Sprague Dawley SD Rats Exposed to Whole-body Radio Frequency Radiation at a Frequency (900 MHz) and Modulations (GSM and CDMA) Used by Cell Phones (November 2018), <https://ntp.niehs.nih.gov/publications/reports/tr/tr595>; Technical Report 596, the same studies in B6C3F1/N Mice at 1,900 MHz (November 2018), <https://ntp.niehs.nih.gov/publications/reports/tr/tr596>; NTP, Cell Phone Radio Frequency Radiation research page (status: Completed), <https://ntp.niehs.nih.gov/research/topics/cellphones>.
9. Maryland Children's Environmental Health and Protection Advisory Council, Wifi Radiation in Schools in Maryland, Final Report (December 13, 2016), recommendations at pp. 8-9. Final report PDF: https://health.maryland.gov/phpa/OEHFP/EH/Shared%20Documents/CEHPAC/MD_CEHPAC_SchoolWiFi_022017_final.pdf. Council page with report and appendices.
10. France, Loi n° 2015-136 du 9 février 2015 relative à la sobriété, à la transparence, à l'information et à la concertation en matière d'exposition aux ondes électromagnétiques, art. 7, Journal Officiel No. 34 (February 10, 2015). https://www.legifrance.gouv.fr/loda/article_lc/LEGIARTI000030214114.
11. 47 U.S.C. 254(h)(1)(B) and 254(i) (E-Rate support and internet safety policy requirement); 47 CFR 54.502 (Category Two support); Federal Communications Commission, Modernizing the E-rate Program for Schools and Libraries, Report and Order and Further Notice of Proposed Rulemaking, FCC 14-99 (released July 23, 2014), <https://docs.fcc.gov/public/attachments/fcc-14-99a1.pdf>.
12. Federal Communications Commission, Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, Declaratory Ruling and Third Report and Order, FCC 18-133 (2018), <https://docs.fcc.gov/public/attachments/fcc-18-133a1.pdf>; 47 CFR 1.6003.
13. Section 1006.07(2)(f), Florida Statutes, as amended by HB 1105 (2025), effective July 1, 2025. Florida Senate bill summary.
14. Sections 1001.41, 1001.42, 1006.062, 1014.04, and 1014.05, Florida Statutes (district school board powers; medication; Parents' Bill of Rights).
15. 20 U.S.C. 1232h (Protection of Pupil Rights Amendment).
16. Radiation Control for Health and Safety Act of 1968, Pub. L. 90-602, codified at 21 U.S.C. 360hh et seq.
17. PERK, A Presumption for Liberty, and PERK, Too Late to Be Made Whole, comments filed in Docket HHS-OS-2026-0332 (September 2026); PERK, Fixing Right to Try, brief to Secretary Kennedy.

18. Joint letter to Congress adopted at the Gathering of America's Mothers, MAHA Center, Washington, D.C., October 12 to 14, 2026, Ask 8 (text on file with the undersigned).
19. National Center for Education Statistics, School Pulse Panel, More than Half of Public School Leaders Say Cell Phones Hurt Academic Performance (February 19, 2025). <https://nces.ed.gov/learn/press-release/more-half-public-school-leaders-say-cell-phones-hurt-academic-performance>.
20. Universal Service Administrative Company, E-Rate Eligible Services Overview, <https://www.usac.org/e-rate/applicant-process/before-you-begin/eligible-services-overview/>; USAC Open Data, E-Rate Request for Discount on Services: FRN Status, dataset qdmp-ygft, <https://opendata.usac.org/E-Rate/E-Rate-Request-for-Discount-on-Services-FRN-Status/qdmp-ygft>.
21. School Board of Broward County, Florida, Florida TaxWatch Review, Q2 Report (February 25, 2016), standard of one wireless access point per classroom. [http://www.broward.k12.fl.us/boc/Reports_TaxWatch/ReviewQ2Report\(02.25.16\)FINAL.pdf](http://www.broward.k12.fl.us/boc/Reports_TaxWatch/ReviewQ2Report(02.25.16)FINAL.pdf).
22. In re Children's Health Defense, No. 26-1121 (D.C. Cir.), Opposition of the Federal Communications Commission to Petition for a Writ of Mandamus (filed September 25, 2026), describing the court's order of August 26, 2026. <https://docs.fcc.gov/public/attachments/DOC-425591A1.pdf>.
23. American Academy of Pediatrics, letter of Thomas K. McInerney, M.D., FAAP, to the Federal Communications Commission, ET Docket No. 13-84 (August 29, 2013), ECFS file 7520941318. <https://ecfsapi.fcc.gov/file/7520941318.pdf>.
24. Karipidis K, Henderson S, Wijayasinghe D, Tjong L, Tinker R, Exposure to Radiofrequency Electromagnetic Fields From Wi-Fi in Australian Schools, Radiation Protection Dosimetry 175(4):432-439 (2017); ARPANSA, Wi-Fi in Schools Measurement Study. <https://www.arpansa.gov.au/research/surveys/wi-fi-in-schools-measurement-study>.
25. Cisco Meraki, SSID Availability, https://documentation.meraki.com/Wireless/Operate_and_Maintain/How_Tos/Features_and_Integrations/SSID_Availability; Using Tags to Broadcast SSIDs from Specific APs, https://documentation.meraki.com/Wireless/Operate_and_Maintain/How_Tos/Features_and_Integrations/Using_Tags_to_Broadcast_SSIDs_from_Specific_APs.
26. 21 U.S.C. 360hh (definitions), <https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title21-section360hh&num=0&edition=prelim>; U.S. Food and Drug Administration, Radio Frequency Wireless Technology in Medical Devices: Guidance for Industry and FDA Staff (August 2013), <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/radio-frequency-wireless-technology-medical-devices-guidance-industry-and-fda-staff>.
27. Centers for Disease Control and Prevention, 2024 School Health Profiles questionnaires, <https://www.cdc.gov/school-health-profiles/questionnaires/index.html>; School Health Policies and Practices Study questionnaire archive, https://archive.cdc.gov/www_cdc.gov/healthyyouth/data/shpps/questionnaires.htm.
28. Oregon SB 283 (2019), Oregon Laws 2019, chapter 677, <https://olis.oregonlegislature.gov/liz/2019R1/Downloads/MeasureDocument/SB283/Enrolled>; New Hampshire HB 522 (2019), Chapter 260, Laws of 2019, https://gc.nh.gov/bill_status/legacy/bs2016/bill_docket.aspx?lsr=0261&sy=2019&txtsessionyear=2019&txtbillnumber=hb522; New Hampshire Commission to Study the Environmental and Health Effects of Evolving 5G Technology, Final Report (November 1, 2020), <https://gc.nh.gov/statstudcomm/committees/1474/reports/5G%20final%20report.pdf>.

29. 47 CFR part 15 (unlicensed radio frequency devices); FCC Universal Licensing System, <https://opendata.fcc.gov/Wireless/FCC-Universal-Licensing-System-ULS-/x28i-i4z4>.