

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

DECLARATION of Chester F. Moss

I, Chester F. Moss, declare under penalty of perjury, that the following statements are true, accurate, and within my personal knowledge:

1. I reside in Westchester County, NY.
2. I am currently employed as a healthcare advertising Creative Director who is reliant on digital devices and platforms (computers and smart phones) to create multimedia communications while engaging with professional colleagues. Quite unfortunately, the same cannot be said for my wife (a writer) who was derailed with flu-like symptoms, dizziness, and intense fatigue at the same time a radiofrequency/microwave (RF/MW) radiation AMR utility meter was installed by the utility company... an installation we were not aware of at the time.
3. Yet, as her partner of many decades, I could see my wife knew something was terribly wrong. At first she concluded that she was suffering from a rare illness... even left a letter in her desk drawer telling our family how much she loved us, in case something grave happened to her. It took her 7 years to connect the dots back to the utility meter that had been installed on our house at the same time her symptoms began. Specifically, it was this radiofrequency/microwave (RF/MW) radiation AMR utility meter that was emitting radiation through the wiring of our house... 24/7.
4. The connection she made was exact and absolute. While standing 7 inches in front of the meter — checking to see whether it was analog or digital — she experienced a thud in her chest that threw her 3 feet backward... at the same time, her cell phone dropped out of her hand as if struck by a lightning bolt. From that moment on, she was unable to use a cellphone, portable phone, or be in Wi-Fi without feeling intolerable neurological symptoms... migraine-like headaches, severe brain fog, dizziness, and worsening fatigue. Every day following the attack, her symptoms escalated and she began to think her brain was being permanently damaged. She knew she had to get the meter off, or escape my home.
5. This is not hearsay. I've witnessed day in and day out, for several years, how she feels and what a massive impediment it's created in her ability to work and function.
6. After the episode with the meter, she immediately called the utility company, told them she had a medical emergency, insisting that the RF/MW meter be removed instantly and be replaced by an analog meter. They refused. She called again. And again. For an entire month, the utility company stalled, made up excuses, and even stated they no longer had analog meters available. As we were to learn, this was simply not true.
7. She reached out and was told it was against the law to remove a utility meter. This meant that she would be forced to endure an injurious RF/MW radiation exposure. The implication? My wife felt like it was against the law to preserve her own life.

8. She packed a bag and prepared to leave for the mountains, not knowing if or where she would find shelter free from exposures to RF/MW radiation. The choices of leaving or staying were equally bad. But she knew she needed to make a decision. It was either going to be the smart meter... or her. Wisely, she decided on herself.
9. The meter was removed and she found an attorney to represent her on a pro bono basis. The attorney overnighted a compelling hard-copy letter to the entire executive staff of the utility company and the President of their Board of Directors. The letter included evidence and a threat to sue. Two days later, an executive field team showed up at our front door, announcing they would replace the RF/MW radiation meter with an analog one.
10. When the RF/MW meter came off the side of our house, my wife's headaches, flu-like symptoms, and neurological symptoms disappeared overnight. Yet, what remained was an extreme reactivity to all sources of RF/MW radiation, a medical condition now known as EMR Syndrome.
11. EMR Syndrome has completely derailed her life. Despite numerous work projects, she's unable to use a cell phone, a computer, or be in Wi-Fi without feeling significant neurological/cognitive symptoms. She dictates all her emails via a landline speakerphone to paid assistants — and attends Zoom meetings on the only device she tolerates (iPad), but must stand 5 feet away and cannot interface with the screen at all. It's awkward but the damage has forced her to compensate.
12. Yet, she counts herself lucky. And I'm in awe of her relentless nature. She's become a fierce advocate for safe technology, using her former leadership skills to found the OneName Project, the grassroots group SafeTech Westchester, and to lead the EMR Syndrome Alliance, the first organization dedicated to people with electromagnetic injuries. She continues to work on advancing a musical project that got stalled years ago. I see how grateful she is to have such a supportive network of family, friends, and colleagues and to live in a home with no smart meter, no Wi-Fi, no smart appliances... And a good distance away from the nearest cell tower.
13. I appreciate the HHS opportunity to share this story. It can only bring this topic to light but we need something more: we need actions to further the critical cause of safe technology. U.S. federal agencies must strengthen protections against RF/MW radiation and other non-ionizing electromagnetic fields (EMFs). This requires updating exposure limits for cell tower and cell phone radiation, restoring federal research and monitoring, improving device testing, and addressing long-term exposures, with particular attention to children, other vulnerable populations, and wildlife. Additionally, federal exposure limits need to be established for the low-frequency electric and magnetic fields emitted by high-voltage power lines and substations; these are regulatory gaps that federal agencies must address.
14. The body of peer-reviewed science linked to the biological effects of RF/MW radiation statistically warrants an overhaul of telecommunications regulations for the protection of Americans. The fact that this hasn't happened yet is indicative of an industry scandal on a par with tobacco — a fact that must be investigated and publicized. RF/MW radiation, also known as man-made electromagnetic radiation (EMR) and commercially, "wireless" radiation. Natural electromagnetic radiation can be beneficial to humans but RF/MW is

pulsed and modulated, making it xenobiotic, i.e., it is harmful to all living things. The primary source of harm is a pulsing modulation. It was introduced into our society as a for-profit venture and was never tested on the public for safety. We cannot go backwards to a world without cell phones — but we can move forward with tighter regulations, protective safety guidelines, and best safety practices. Public health and safety are non-negotiable.

15. As we carve out a safer future, the federal government must 1) prohibit Congress, including special committees, from accepting donations from corporate interests, and 2) the FCC must require employees to sign a non-compete clause, disallowing them to work for the telecommunications industry for a period of years following their tenure at the FCC.
- 16. I did not consent, nor do I consent today, to the continuous, involuntary exposure to biologically-active RF/MW radiation.**
17. I endorse the following actions that have been assembled by Safe Technology advocates:

Research and Independent Scientific Review

- Restore independent federal research programs and coordinated interagency review of the scientific evidence. All activities and funding should be publicly reported.
- Direct federal agencies to commission the National Academies of Sciences, Engineering, and Medicine to review the health and environmental effects of non-ionizing electromagnetic fields, including RF and ELF exposures, and issue actionable policy recommendations, research priorities, monitoring, and protection of children, workers, and ecosystems.
- Direct the National Institute of Environmental Health Sciences (NIEHS) to conduct a comprehensive, transparent review of human, animal, and mechanistic evidence on the health effects of RF, ELF and other non-ionizing exposures, including chronic exposure and vulnerable populations. Prioritize evaluations of RF radiation and ELF magnetic fields for inclusion in the National Toxicology Program's Report on Carcinogens.
- Expand research to encompass all artificial non-ionizing frequencies, including powerlines, charging systems, wireless power transfer, LED systems, satellite systems, and mmWave–THz bands associated with emerging technologies.

Risk Assessment and Exposure Limits

- Update RF radiation exposure limits based on a comprehensive review and risk analysis of scientific research to address long-term, cumulative exposures and non-thermal effects, with risk-mitigation protections for children, pregnancy, and medically vulnerable populations. The approach should be a public health approach of risk mitigation.
- Science based safety limits for health need to be developed for all artificial non-ionizing frequencies, including from charging systems, wireless power transfer, LED systems, satellite systems, and mmWave–THz bands associated with emerging technologies.

- Develop wildlife-specific exposure limits and immediate policies to mitigate wildlife exposure and environmental exposures in ecologically sensitive areas.
- Require regular, publicly scheduled reviews of exposure limits and regulations based on current scientific evidence, with public participation, independent scientific review, and timely revisions to address new findings, technologies, and exposure patterns.

Safety Testing and Enforcement

- Require premarket safety testing for health effects from chronic exposure for all new wireless technologies, and for proposed electrical grid infrastructure (such as high voltage 765 kv power lines) emissions, just as is required for drugs.
- Modernize cell phone and wireless device compliance tests to reflect real-world use of people of all ages, including direct body contact and simultaneous exposure from multiple devices.
- Establish routine robust post-market RF radiation compliance testing for all cell phones, RF emitting devices, cell towers, base stations etc., with all results publicly posted and meaningful enforcement.

Exposure Monitoring and Health Surveillance

- Implement a nationwide RF and EMF exposure measuring and monitoring program prioritizing schools, workplaces, residential areas, and sensitive wildlife habitats with 24/7 monitoring.
- All measurements should be publicly posted on an easy to access website with the ability to see measurements over time.
- Analyze data with regular updates for the public.
- Create a national health and environmental surveillance system to document and investigate suspected adverse effects.

Consumer Information and Public Education

- Require clear RF radiation exposure labeling on all cell phones, Wi-Fi, Bluetooth and wireless devices, packaging, and at the point of sale, including applicable separation distances for the test system (if the FCC continues to refuse to update the tests) and practical instructions to reduce exposure.
- Require clear EMF exposure labeling for charging cords, power adapters, appliances, and other electronics, including information on electric and magnetic field emissions and practical instructions to reduce exposure.
- Launch a multimedia public health education campaign for the American public on wireless and cell phone radiation, covering cell phones, Bluetooth devices, laptops, tablets, Wi-Fi routers, and other RF-emitting devices, with clear, practical guidance on reducing exposure and using wired alternatives. Ensure clear straightforward guidance and the importance of using wired alternatives.

- Expand public education to address electric and magnetic field exposures from charging cords, power adapters, appliances, and other electronics, with clear guidance on reducing exposure through distance, placement, and equipment use.

Risk Mitigation and Exposure Reduction

- Mitigate RF and EMF exposures in schools and childcare settings, prioritize wired connections, and establish protective siting policies to ensure schools are not near RF or EMF emitting infrastructure.
- Prohibit cell towers and high-voltage power lines on or near schools.
- Incentivize technologies and research that eliminate and/or reduce exposure, including readily available Ethernet connections and other wired options.
- Require manufacturers to provide readily usable wired connection options, including plug-and-play Ethernet and cable connections instead of wireless.
- Require manufacturers and network developers to demonstrate that they have researched and integrated EMF reduction strategies into devices and network deployment.
- Consider a federal certification program for no/low EMF technologies and spaces.
- Issue guidance to local governments and institutions on reducing exposures through infrastructure siting, land use planning, building networks, and device selection.

Accessible Public Spaces and Medical Facilities

- Ensure public libraries and other public accommodations provide designated areas free of intentional wireless RF emissions, with wired internet access and measures to minimize other non-ionizing EMF exposures.
- Ensure hospitals, medical offices, and other healthcare facilities provide designated areas and reasonable accommodations for people needing no/low EMF areas while maintaining access to necessary medical equipment and care.
- Establish safeguards and exposure-reduction protocols in patient rooms, waiting areas, maternity units, neonatal units, and other settings serving medically vulnerable populations.

Education and Training for Medical Professionals

- Incorporate education on RF and other non-ionizing EMF exposures into medical, nursing, and allied health curricula.
- Develop independent continuing education on the scientific evidence, research gaps, exposure assessment, and practical exposure-reduction measures.
- Train healthcare professionals to take environmental and occupational exposure histories, including exposures from wireless devices, cell towers, power lines, and workplace equipment.
- Develop clinical guidance for evaluating and supporting patients reporting symptoms associated with EMF exposure, including assessment of other possible causes and appropriate referrals.

- Train healthcare professionals on exposure-reduction counseling for children, pregnant patients, workers, and medically vulnerable populations.
- Provide training on reasonable accommodations and reducing exposures in healthcare settings.
- Establish training on documenting and reporting suspected adverse effects to the national health surveillance system.
- Develop medical education materials and training programs.

Consumer Information and Public Education

- Require all relevant federal agencies to provide clear, publicly accessible information on RF and other non-ionizing EMF exposures, acknowledging that scientific evidence exists reporting associations with adverse health effects, with links to the research and explanations of findings and uncertainties.
- Require the CDC, FDA, and other relevant federal health and environmental agencies to educate the public on practical ways to reduce RF and EMF exposures, including the use of wired alternatives. This should extend beyond cell phones.
- Require the FDA to establish and enforce clear RF and EMF radiation exposure labeling requirements for cell phones and other RF-emitting consumer devices, including information on packaging and at the point of sale, applicable testing separation distances, and practical instructions to reduce exposure.

Workplace Safeguards

- Establish a comprehensive occupational health program for EMF safety
- Characterize and monitor exposure levels in a broad range of exposed occupations, from telecom, plastic industry, utilities, healthcare, military, to retail and education.
- Establish standardized medical surveillance with mandatory recordkeeping and reporting to track worker health and exposure incidents, including overexposures.
- Initiate R&D and innovation programs that prioritize low-EMF design and emission reduction in industrial and workplace technologies, focusing on minimizing unnecessary EMF exposures through improved engineering and manufacturing practices.
- Require machinery and equipment to incorporate engineered EMF controls, shielding, and design features that minimize worker exposure, with verified performance and routine maintenance checks.
- Issue comprehensive, site-specific guidance to minimize EMF exposure and mitigate risk, with special provisions for accommodating pregnant workers, medically vulnerable individuals, and persons with implants.
- Ensure employer/worker training and education.

Restore State and Local Authority

- Congress should restore state and local authority to consider health and environmental effects when deciding where wireless infrastructure may be located, including by amending federal laws that restrict such consideration.
- State and local governments should be empowered to establish protective setbacks for cell towers, high voltage power lines and substations, assess cumulative exposures, protect schools and other sensitive locations, and require meaningful public participation in siting decisions.