



October 19, 2026

Commenting on a Notice by the **Department of Health and Human Services, HHS-OASH-2026-0397**

[Request for Information on Electromagnetic Fields \(EMFs\), Radiofrequency \(RF\) Radiation, and Wireless Radiation Exposure](#)

Dear Secretary Kennedy and the Electromagnetic Radiation Investigation Team,

Thank you for your timely evaluation of today's man-made electropollution.

We are submitting this public comment under:

Additional Information

*18. Please identify any additional scientific evidence, technical information, data, or **recommendations** that federal health agencies should consider when evaluating potential adverse health effects associated with RF/EMF radiation exposure.*

We are excited to share that we have already developed **Safer Screentime, a science-based practical course on RF/EMF radiation risks and safer solutions that can train the masses in about an hour on-line**. We began this work in 2016 and our course is/was the first in the world in this area.

Please allow us first to introduce ourselves:

Mikko Ahonen, PhD: Trustee, Research & Development

Mikko has worked as a researcher at the University of Tampere and JAMK University of Applied Sciences in Finland and Mid Sweden University for over 20 years. His research has focused on IT, educational technology and bioelectromagnetics. He has written many scientific publications in the EMF and health research group of Lennart Hardell, MD (see the list at the end of this document), which focus on risk-management of mobile technologies in society, schools and workplaces.

Cecelia Doucette, MTPW: Director, Education Services

Cece is a technical and professional writer by trade, who helped Ashland Public Schools in Massachusetts become the first public school district in the United States adopt Best Practices for Mobile Devices. Cece also worked with her public library to become the first in the nation to



host a film series on Electromagnetic Radiation and Health, and to put on loan a broadband radiofrequency (RF) radiation meter for residents to borrow. She has inspired others around the country to do the same. Cece further collaborated with legislators to introduce a number of bills (across the nation) addressing wireless radiation and public health, and worked with her Massachusetts Department of Public Health to draft EMF Fact Sheets. She was honored to present state and local policy at the EMF Medical Conference. Cece is humbled by the opportunity to help educate global citizens through on-line course development and promotion with Safer Screentime.

Safer Screentime Vision

Safer Screentime (<https://www.saferscreentime.org/courses/safer-screen-time-e-learning-course/>) is dedicated to delivering science-based education and training for safer use of wireless technology in our homes, places of work, schools and other public buildings.

It is our sole aim to present this complex scientific information in a non-biased, easy to understand way, so we can all learn to use wireless technologies more safely. We have researched medical and scientific information so participants don't have to (although we encourage independent investigation too!).

Social responsibility is at the heart of what we do. Our intention is to make the world a safer, better place for ourselves and our children.

Leading Edge Learning

We work closely with the leading research institutions worldwide to ensure we are at the forefront of the latest research. We also capture the most recent legislative changes, and the current biologically-based medical recommendations in order to provide this crucial information to wireless technology users.

All our work is aligned to the guidance issued by the Vienna Medical Association, the Council of Europe, RNCNIRP, Building Biology Standards SBM-2024 and EUROPAEM EMF 2016.



The Safer Screentime Course

This [risk management course](#) is geared toward adults, parents, teachers, teenagers, medical professionals, technology specialists, corporate risk managers, municipalities, general employees and legal experts.

The Safer Screentime Course is comprised of 16 lessons and is customizable for future needs. We begin with the risks of excessive screentime, particularly for child development, then present the peer-reviewed published science and medical recommendations for reduction of radiofrequency radiation exposures:

Lesson 1: What a Child Truly Needs to Properly Develop

Lesson 2: Digital Dependency on the Rise

Lesson 3: What is Wireless Radiation and Why Should I Care?

Lesson 4. How Can I Save Energy?

Lesson 5. How is Your Mental Health?

Lesson 6. Have You Read the Legal Fine Print?

Lesson 7. What to Know About Personal Devices

Lesson 8. Technology: Taking Precautions

Lesson 9: How Can I Use My Cell Phone More Safely?

Lesson 10: How Can I Use My Tablet and Laptop More Ergonomically?

Lesson 11. What About Wi-Fi Routers?

Lesson 12. International Medical Recommendations

Lesson 13. Cancer Studies

Lesson 14. Early Symptoms, Electromagnetic Radiation Syndrome and Medical Resources

Lesson 15. New Developments: Government & Legislation

Lesson 16. General Guidelines



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References

The Safer Screenshot Course also includes a list of References with supporting documentation for those who wish to learn more:

1. Some countries, like [The Netherlands, Finland and Sweden](#), are **leading the way by removing technology from the classroom**, except for medical necessity and to teach technology skills in media labs.
2. For additional information on **childhood development**, please see [Reconnect Webinars](#) by pediatric occupational therapist Cris Rowan.
3. We have [volumes of scientific studies](#) now showing excessive screen time **can cause harm**.
4. A useful resource is the **American Academy of Pediatrics'** [Family Media Plan](#).
5. For those struggling with screen-related mental health issues or **digital addiction**, see this short video [Reset Your Child's Brain](#).
6. For those not clinically addicted but recognizing the need to **reduce screentime and add balance back** into our lives, the Cleveland Clinic, a non-profit academic medical center, shows us how in [How to Do a Digital Detox for Less Stress, More Focus](#).
7. Cabled connections are [not only safer, they are more reliable, faster, and more secure than Wi-Fi & mobile data](#).
8. Back in 2012 a [Greenpeace analyst](#) indicated if the "cloud" were a country, it would be the **fifth largest consumer of energy in the world**.
9. The **IEEE Communications Magazine** pointed out: "[Wireless technologies will continue to consume at least 10 times more power than wired](#)".
10. Further, [5G is predicted to consume 3 times more energy than 4G!](#)
11. See the Environmental Working Group fact sheet, "[Effects of radiofrequency radiation on the nervous system](#)".
12. See also the paper "[Microwave frequency electromagnetic fields \(EMFs\) produce widespread neuropsychiatric effects including depression](#)".
13. Those interested in sensitivity of the brain may also like to read "[Threshold of radiofrequency electromagnetic field effect on human brain](#)".



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14. If you suspect your child may be suffering from **Excessive Screen Syndrome**, see Dr. Victoria Dunkley's book, [*Reset Your Child's Brain: A Four-Week Plan to End Meltdowns, Raise Grades, and Boost Social Skills by Reversing the Effects of Electronic Screen-Time*](#).
15. See [Show the Fine Print](#).
16. See: Belyaev *et al.* (2022). [Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation: Implications for 5G](#). *Environmental Health*, 21(1), 92.
17. Field strength drops off rapidly with distance from the device. However, technologies using **low frequency pulsing** (like Wi-Fi router with its 10 Hz beacon signal pulse) are [considered very bioactive and disruptive to our cells even at rather low wireless radiation levels](#) if the wireless antennas are left on.
18. The **Precautionary Principle** is defined in a [2004 World Health Organization report](#).
19. In 2011, the [Council of Europe](#) adopted the **ALARA Principle** with regards to wireless radiation exposure, especially in schools.
20. The [U.S. Centers for Disease Control and Prevention \(CDC\)](#) also recommend adhering to ALARA for radiation safety.
21. Some devices have an Ethernet port; others may require you to **purchase an Ethernet adapter**.
22. The **American Academy of Environmental Medicine** [recommends schools access the Internet through wired connections and avoid Wi-Fi](#).
23. See [Tech Safe Schools](#) for **resources to help your schools transition to safe tech**.
24. Hansraj, K. K. (2014). [Assessment of stresses in the cervical spine caused by posture and position of the head](#). *Surgical Technology International*, 25, 277–279.
25. [Extensive research](#) shows this Wi-Fi's carrier wave with its **low-level pulses are shown to be bioactive and possibly harmful**.
26. The **German government recommends** [installing routers outside of classrooms](#), in hallways and preferring Ethernet-connections instead of Wi-Fi if possible.

This research paper shows that **wireless radiation exposure to a child's head and back increased up to 40-fold** when surrounded by other children with laptops, due to cumulative emissions **from all the nearby devices in a classroom**. More distance is needed. [Soares, N. E., Bulla, G., Fernández-Rodríguez, C. E., & Salles, A. A. A. de. \(2025\). SAR Estimations in a Classroom with Wireless Computers. *Journal of Microwaves, Optoelectronics and Electromagnetic Applications*, 24, e2025288526. "](#)



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27. In 2012 a group of over 1,000 German doctors published [the Freiburger Appeal](#), which called for substantially **lowered international exposure standards** to reflect non-thermal biological effects.
28. Since 2015, more than 250 wireless radiation experts from around the world have formally requested that the **United Nations** intervene and lower exposure standards, due to the environmental risk, as part of the [EMFScientist.org](#) International Appeal.
29. In 2015, the [Vienna Medical Association](#) published 10 medical mobile phone rules.
30. In 2017, the Mediterranean country of Cyprus signed the nation-wide [Nicosia Declaration on Electromagnetic and Radiofrequency Radiation](#).
31. Prestigious medical groups and individuals representing thousands of health care professionals signed on to the [2020 Consensus Statement](#) of **UK and International Medical and Scientific Experts and Practitioners on Health Effects of Non-Ionising Radiation (NIR)**.
32. In 2021 the **Massachusetts Medical Society** issued a [policy statement](#) recognizing the need to address *safety limits of human exposure to radio frequency radiation*.
33. More than 400 EMF scientists and doctors have signed the [5G Appeal to the European Union](#) calling for a moratorium on the rollout of 5G.
34. In 2011, the **World Health Organization's International Agency for Research on Cancer** extensively analyzed research published worldwide and [classified the wireless radiation from wireless devices as 'possibly carcinogenic,'](#) i.e., could cause cancer.
35. In 2018 a **U.S. National Toxicology Program (NTP)** study [found wireless radiation caused DNA damage, and brain and heart tumours in rodents](#). Another large study by the Ramazzini Institute in Italy [confirmed the same findings of cancer and DNA damage](#). WHO Review, Mevissen et al. (2025), [Finds Cancer Risk in RF-Exposed Animals](#).
36. **Oxidative stress** is a precursor to many of the illnesses and health issues we see today, in addition to [DNA-damage](#).
37. Professional medical training is available through the [EMF Medical Conference](#) for self-paced on-line training.
38. CHD Wireless Radiation Sickness Gets a New Name: [EMR Syndrome](#)
39. Feel free to print this [letter](#) to help **open this important conversation** with your health care practitioners, your schools and your town's emergency responders/firefighters.
40. The first **medical school textbook** is now available, [Electromagnetic Fields of Wireless Communications: Biological and Health Effects](#).



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41. The **Alliance of Nurses for Healthy Environments** [*Textbook of Environmental Health in Nursing*](#) includes A New Form of Environmental Pollution: Wireless and Non-Ionizing Electromagnetic Fields, p. 136-160 (free download).
42. For further **scientific information** see [PubMed](#).
43. See also [*EUROPAEM EMF Guideline 2016 for the prevention, diagnosis and treatment of EMF-related health problems and illnesses*](#).
44. The **Federal Communications Commission** (FCC) is responsible for regulating radiation exposure levels, and the agency has been [sued for ignoring 11,000 pages of evidence of harm](#).
45. Following a year-long investigation by highly qualified doctors, scientists, engineers and others, the **New Hampshire Commission** of legislators issued a [final report](#) documenting conflicts of interest with government agencies and the wireless industry.
46. The **California Department of Public Health** issued [Guidelines on How to Reduce Exposure to Radiofrequency Energy from Cell Phones](#).
47. **Louisiana** passed a law and developed [Digital Device Guidelines](#) to address the negative health effects of excessive screen time, and to restore the balance of human connection, movement, touch, nature time, and proper ergonomics while using screens. A [large list of policies](#) is situated on Environmental Health Trust's page.
48. The **French ANFR**, which governs radio frequencies, **tests exposures** and has required tech companies including [Apple to fix cell phones](#) that exceed government radiation limits.
49. A **radiofrequency/microwave radiation detection meter** can help you to identify 'invisible' radiation. Feel free to see [recommendations at Safe Living Technologies](#).

Certificate & Tips

We include short **quizzes** throughout the course to underscore important concepts and action steps. Upon completion, participants can print out a **Certificate of Completion** with their total quiz score which is useful for workplace training compliance tracking. Quiz questions can be revisited for those wishing to enhance their learning and improve their score.

Students can also print out a handy **tip sheet** at the end with reminders for safe technology use.



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Next Steps

We would be honored to open discussions with your HHS team to consider our course among the resources to provide to the public. The content can easily be modified as warranted.

You are welcome to access the Safer Screenshot Course here:

<https://www.saferscreenshot.org/courses/safer-screen-time-e-learning-course/>

Please let us know if we can grant you complimentary credentials to assess the course.

Respectfully submitted for the public record,

Mikko Ahonen, PhD,

Cecelia Doucette, MTPW

SCIENTIFIC PUBLICATIONS by MIKKO AHONEN, PhD

Koppel, T., Ahonen, M., Carlberg, M., & Hardell, L. (2022). [Very high radiofrequency radiation at Skeppsbron in Stockholm, Sweden from mobile phone base station antennas positioned close to pedestrians' heads](#). *Environmental Research*, 208, 112627.

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