Public Comment: Wallington, New Jersey

Docket HHS-OASH-2026-0397 · Request for Information, 91 FR 59792 · Szymon Sikorski · Wallington, New Jersey

Comment text (as entered in the regulations.gov comment box). The full report follows.

WALLINGTON, NJ: OUR CHILDREN LIVE INSIDE THE SIGNAL, 24 HOURS A DAY.

Every person in Wallington lives within half a mile of a cell antenna installation. Most live within half a mile of two or more.

I ask HHS to make Wallington a pilot site and to come see it. My full report is attached.

ABOUT ME. Szymon Sikorski. Medical degree; 20 years in medical research analysis, the last five on cancer. Parent of a child in Wallington public schools. I write for no institution.

For six years I lived and worked from home near the Hathaway Street Park cell tower. Day and night. Then I was diagnosed with cancer.

Now I live with it, and with the fear of it getting worse. How much of it came from six years of round-the-clock RF and EMF exposure? No one can tell me. No one ever measured it.

PEOPLE SEE ONE TOWER. WE HAVE SIX INSTALLATIONS. They carry more than 70 panels, most hidden in plain sight: on a water tank next to an elementary school, an apartment roof where families sleep directly under eight antennas, a self-storage building, an old water tower and a chimney. You may see a tower 2,000 feet away and miss the antennas much closer to home. Not one has ever been held to Wallington's own 500-foot rule.

THE WARNINGS ARE NOT NEW. The World Health Organization's cancer agency (IARC) lists radio-frequency radiation, and magnetic fields from electrical equipment, as possibly causing cancer in humans. In 2019, and again in 2024, its advisers called a new cancer review a high priority. The American Academy of Pediatrics told the FCC its limits do not account for children and pregnant women, and a federal court ordered the FCC to explain how they protect children long term. Firefighters asked for a federal study of antennas on their stations in 2004. It was never done.

WHY 1,500 FEET? In Germany and Israel, studies found more cancers among people living within about 1,150 to 1,300 feet of cell antennas. A 1,500-foot buffer covers that distance. Legislators keep proposing 1,500 feet or more from schools; in New Hampshire, 1,640 feet from homes and schools. In Wallington, 83% of homes are within 1,500 feet of an installation.

24 HOURS A DAY, NOT 30 MINUTES. FCC limits were set in 1996 to stop tissue heating, averaged over 30 minutes. They do not count years. Our exposure does not stop after 30 minutes. It never stops.

THINK OF ONE WALLINGTON CHILD. She spends her school day at Gavlak Elementary, 180 feet from antennas on the water tank, with three installations within half a mile. Then she comes home, still within reach of more. She sleeps there. In the morning she goes back. Year after year, while her brain and body are still growing, her exposure adds up.

No one has ever studied a child like her. Her teachers may spend whole pregnancies 180 feet from those antennas. No one has studied that either.

WHAT I MEASURED. In neighbors' homes within 900 feet of the tower, RF read about 7 mW/m². In the park where children play, 20 to 33. Magnetic fields at the tower's base reached

45 mG. All far below FCC limits. Yet studies found effects at these levels: where RF was higher, students scored lower on memory tests, schoolchildren had more DNA damage markers, and residents reported more symptoms. Children in homes averaging above 4 mG had about double the leukemia risk.

RISK VERSUS BENEFIT. The Borough collects about $80,000 a year from two of these sites. That is $6.78 per resident per year. About $41 over six years.

$41. Against cancer. Against a parent's worry that never ends.

THE TOWER COMPANY WILL NOT CARRY THE RISK. The company holding the Hathaway tower lease tells investors it has no significant insurance against RF health claims. Insurers have long excluded these risks.

Why are they worried about liability? What do they know that we do not?

TOWNS ARE REMOVING ANTENNAS, NOT JUST BANNING NEW ONES. In California, a carrier removed a tower from an elementary school after four students got cancer, even though it tested within federal limits. In New York, a 150-foot tower beside a public housing playground came down after residents objected. India's Supreme Court ordered a tower switched off for a cancer patient who said it hit his home 24/7 for 13 years.

Here, no one was even told. Not residents, not parents, not the school.

Everyone who understands this now carries one more worry, every day, especially parents. Home values and taxes suffer too; the report covers that.

WHAT I ASK. (1) A health-based distance from schools and homes, and moving antennas that are too close, starting on public property. (2) Make every antenna's owner, frequencies and power public. (3) Link cancer and birth records to antenna history. (4) Study children exposed at school and at home, for years. (5) Come to Wallington.

Six Installations in One Square Mile: What 24-Hour Antenna Exposure Means for the Health of a New Jersey Town

Response to the Request for Information on Electromagnetic Fields, Radiofrequency Radiation and Wireless Radiation Exposure, 91 FR 59792 (Sept. 21, 2026), Docket HHS-OASH-2026-0397 [1]. Szymon Sikorski · Wallington, New Jersey · October 20, 2026. Questions addressed: 2–18.

Why I am writing (Q2)

I hold a medical degree. I have spent 20 years in medical research analysis, the last five focused on cancer. I am the parent of a child in Wallington's public schools. I write for no institution.

I am also a cancer patient.

For six years I lived and worked from home near the cell tower in Hathaway Street Park. Day and night. Then I was diagnosed with cancer.

I live with that diagnosis now, and with the worry that it will get worse. How much of it came from six years of round-the-clock exposure? No one can tell me. No one ever measured it.

What I can do is what I was trained to do: look at the evidence honestly, and ask the questions no one in my town has asked.

What we are seeing in Wallington is hard to believe.

People here think we have one cell tower. We have six antenna installations, carrying more than 70 panels, in one square mile. Only one looks like a tower. The rest sit on a water tank beside an elementary school, on the roof of an apartment building where families sleep under them, on a self-storage building, on an old water tower and on a chimney. They went up one at a time, over 20 years, around our homes and our children's school.

As far as any public record shows, not one protection in Wallington's own code was ever applied to any of them.

No setback. No antenna inventory. No site-plan review. No yearly RF reading. No notice to residents, parents or the school.

In other towns, one proposed tower brings out packed meetings and petitions. Here, six installations went up, and almost no one knew. Not because they are harmless, but because most of them do not look like towers.

This report is about health.

It is about children who spend the school day beside antennas, then go home and sleep beside more. It is about parents who, once they understand this, carry one more worry every single day. It is about why the World Health Organization's cancer agency, the

nation's pediatricians, a federal court, firefighters, and even the tower company's own insurers have raised the same concern, and why no one has answered it.

How this report is built. Every fact comes from a public record, an FCC filing, 2020 Census data, a news report or a published study. Each one is numbered so anyone can check it. What I saw myself is marked as mine. My meter readings are screening readings: they show where real measurement is needed. Each request names who should act.

Summary of findings

1. The warnings are real, and they keep coming. The World Health Organization's cancer agency (IARC) lists radio-frequency radiation as possibly causing cancer in humans (2011). It lists the magnetic fields from electrical equipment the same way (2002). In 2019, and again in 2024, its advisers called a new cancer review of radio-frequency radiation a high priority [2–5]. The American Academy of Pediatrics told the FCC its limits do not account for children and pregnant women [6]. A federal court ordered the FCC to explain how its limits protect children over the long term [7]. Firefighters asked for a federal health study in 2004. It was never done [8, 9] (§II).

2. Why 1,500 feet? The cancer studies point to that distance. In Germany and Israel, studies found more cancer among people living within about 1,150 to 1,300 feet of cell antennas [10, 11]. Legislators have proposed buffers of 1,500 to 1,800 feet around schools, and in New Hampshire 1,640 feet from homes, parks, playgrounds and schools [12–14].

In Wallington, 83% of homes are within 1,500 feet of an antenna installation. Every home is within half a mile [15].

3. People see one tower. We have six installations, hidden in plain sight. More than 70 panels sit on a park monopole, a water tank 180 feet from an elementary school, an apartment roof, a self-storage building, an old water tower and a chimney. Wallington's 500-foot rule covers only new freestanding towers, so it reached none of them. As far as any public record shows, none went through the antenna inventory, site-plan review or yearly RF readings the code requires (§V, §VI-A).

In other towns, people fight one tower for years. In Wallington, six installations went up around our homes and a school, and no rule was applied to any of them.

4. Our exposure is 24 hours a day. FCC limits were set in 1996 to stop tissue heating, and they are averaged over 30 minutes [16, 17]. They do not count years. A Wallington child spends the school day 180 feet from antennas, then goes home to a town where every home is within half a mile of an installation, and most within half a mile of two or more. Adults who work from home, as I did, never leave it (§III).

5. Studies found effects at the levels I measured. My readings in neighbors' homes within 900 feet of the tower, and in the park where children play, fall in the range where studies found lower memory scores in students, more DNA-damage markers in schoolchildren, and more symptoms in residents [18–20]. Magnetic fields at the tower's

base reached 45 mG. Children in homes averaging above 4 mG had about double the leukemia risk [21] (§I, §IV).

6. The tower company will not carry the risk. The company holding the Hathaway lease tells its investors it has no significant insurance against RF health claims [22]. Insurers have excluded these risks for years [23, 24].

Why are they worried about liability? What do they know that we do not?

7. Other places are removing antennas, not just banning new ones. A carrier removed a tower from a California elementary school after four students were diagnosed with cancer, even though it tested within federal limits [25]. A 150-foot tower beside a New York public housing playground came down after residents objected [26]. India's Supreme Court ordered a tower switched off for a man with lymphoma who said it hit his home "24/7" for 13 years [27] (§II).

8. Risk versus benefit. In 2024 the Borough collected just $80,408.85 from the two installations on its property [28]. That is $6.78 per resident per year. About $41 per resident over six years.

$41. Against cancer. Against a parent's worry that never ends.

The other four installations pay their rent to private owners. Yet 93% of residents live within half a mile of one of them [15].

9. No one was told, and no one can find out. Wallington's code requires an antenna inventory, site-plan review and yearly certified RF readings [29]. None is public. My records requests keep being delayed. In December 2025 the FCC record for the water tank next to Gavlak Elementary changed to a greater height, and what changed is not public [30] (§V, §VI).

Not residents. Not parents. Not the school.

10. Who is living with cancer now? Wallington's Board of Health counts cancer deaths. That is not enough. Cancer takes years to develop. The state cancer registry knows who in Bergen County has been diagnosed and is living with cancer today. No one has compared that with where these antennas are (§VIII).

Are we putting our children in danger? No one can answer that, because no one has looked.

11. No one has studied this. No study has followed children exposed for years at home and at school, or pregnant women living and working inside a cluster like this [31–33] (§III, §IV).

12. Homes and taxes pay too. Homes near visible antennas sell for less [34]. Lower home values shrink the tax base everyone shares (§VI-E).

What HHS should verify for itself:

1. What transmits from each of the six sites, at what power, and since when?

2. How much RF and magnetic field reaches Gavlak's classrooms and the homes within 500 feet, day and night?
3. How many people living near these installations have cancer now, and are those rates what would be expected?
4. Were the required inventories, site plans and yearly RF readings ever filed? If not, why not?
5. What changed on the water tank in December 2025, and who reviewed it?

I. My experience (Q3a–g)

(a) The source. For six years I lived near the Hathaway Street Park monopole. The Borough calls it "94 Hathaway Avenue." The FCC registration (1257356) calls it "Hathaway Street (Wallington Outdoor Hockey Rink)," 145 feet tall [35]. It is registered to T-Mobile USA Tower LLC. The Borough's ground lease, first signed with Omnipoint in 2003, is now held by Crown Castle's affiliate CCTMO LLC [35, 36].

The monopole has two tiers of equipment:

- top tier: four large rectangular panels, four standard panels and four square units;
- lower tier, about halfway up: four large rectangular panels with four square units beside them.

It was modified in 2015 [35]. In 2021 the Borough let another carrier, Dish Network, onto it [36].

People living near it have a right to know which units belong to which company, what each one sends out, and when each was installed. No public record says.

(b) How long. I work from home. My exposure was not an hour here and there. It was day and night, weekdays and weekends, for six years.

(c–d) What happened. After six years living near the Hathaway Street Park monopole, I was diagnosed with cancer. I believe this long exposure is part of the problem, and it should be investigated. Five years of research have strengthened that belief.

Now I live with it, and with the worry that it will get worse. That worry does not end. I would not wish it on any parent in this town.

(e) Care. I was diagnosed and treated through standard clinical care. My records are available confidentially to an authorized public-health investigator.

(f) Readings. No one publishes what these sites send out, so I measured it myself. I took screening readings in neighbors' homes within 900 feet of the monopole, and in the park beside it, where parents sit and children play.

Where	Meter	Usual reading	Highest
Park, near the monopole base	GQ EMF-390, RF (±10 dB [37])	20–33 mW/m², changing constantly	131 mW/m² (one second)

Where	Meter	Usual reading	Highest
Inside homes within 900 ft	GQ EMF-390, RF	about 7 mW/m²	14 mW/m²
Park, 10 ft from the base	TriField TF2, magnetic	3–45 mG, changing constantly	45 mG

The meter's own background noise is about 0.01 mW/m² [38]. These readings are 500 to 4,000 times higher, so they are real signals, not meter noise.

Upper floors read higher. In neighbors' homes, with every wireless device turned off, Wi-Fi included, readings rose about 4 mW/m² from the ground floor to the top floor. That matches how the beams are aimed (§IV-B).

Bedrooms are usually upstairs. That is where children sleep.

What the numbers mean:

- **Far below FCC limits.** The FCC allows roughly 4,700 to 10,000 mW/m², depending on frequency [16]. Those limits were set in 1996 to prevent heating, averaged over 30 minutes.
- **Far above normal background.** European children and teenagers carry about 0.1 mW/m² on average [39, 40]. These readings are 70 to 300 times that.
- **At levels where studies found effects:**
  - In a 2019 study of two schools near cell towers, students at the school with more RF (about 100 mW/m² versus 20) scored lower on memory and motor tests [20]. The park readings are in that range.
  - In a 2026 study, schoolchildren with more RF at school, up to about 2 mW/m², had more DNA-damage markers (micronuclei) in their cheek cells [18]. The difference between one floor and the next in these homes is twice that level.
  - In a 2025 study, residents with the most RF at home, 5 to 8 mW/m², reported more symptoms, including anxiety, memory problems and joint pain [19]. Readings in these homes are at that level.

(g) Magnetic fields. At the base of the monopole, magnetic readings swung between 3 and 45 mG. They fell the farther I moved from the base. The nearest power lines are more than 100 feet away, which points to the site's own equipment. These are spot readings, not 24-hour averages. Still, they reach more than ten times 4 mG. Pooled studies found that children whose homes average above 4 mG had about double the risk of leukemia [21].

This is where children play.

(h) What I changed. I no longer take my child to Hathaway Street Park, because of these readings. It is our park by the river, with the rink and the playground. The Borough is now spending $1.32 million to fix it up (§VI-F). I still will not take my child there.

(i) What HHS should verify:

1. What exactly transmits from the Hathaway monopole, and at what power?
2. What equipment produces the magnetic field at its base?

3. How much RF reaches the upper floors of homes within 900 feet, at night?
4. Were the RF readings the code requires ever taken here?

II. The warnings: what health agencies, doctors, courts, firefighters and insurers have said (Q6, Q12, Q18)

Wallington residents are told there is nothing to worry about, because the antennas meet FCC limits.

That is not what the people who study cancer, care for children, or insure risk have said.

A. The World Health Organization's cancer agency.

- **2011.** The International Agency for Research on Cancer (IARC), part of the World Health Organization, classified radio-frequency radiation as "possibly carcinogenic to humans" [2].
- **2002.** IARC put power-frequency magnetic fields, the kind that come from electrical equipment, in the same class [3]. A main reason: pooled studies found about double the childhood leukemia risk in homes averaging above 4 mG [21].
- **2019.** IARC's advisers called radio-frequency radiation a "high priority" for a new review [4].
- **2024.** Its advisers said it again: a new review of radio-frequency radiation, again a high priority, for 2025–2029 [5].

Twice in five years, the advisers to the world's cancer agency said this question needs a fresh look. Wallington's children cannot wait for it.

B. The nation's pediatricians. In 2013 the American Academy of Pediatrics told the FCC that "current FCC standards do not account for the unique vulnerability and use patterns specific to pregnant women and children" [6].

The limits have not changed since.

C. A federal court. In 2021 a federal appeals court found the FCC had not explained why its limits protect against harms other than cancer. It ordered the FCC to address children, long-term exposure and new technology [7]. The FCC is only now taking comment on that order, five years later.

D. State children's health advisers. Maryland's children's environmental health council asked the FCC to review its limits [41, 42].

E. Firefighters. In 2004 the International Association of Fire Fighters, whose members sleep in their stations, asked for a federal study of firefighters housed with antennas. It opposed new antennas on fire stations until they were shown to be safe [8]. In 2017, California lawmakers exempted fire stations from a small-cell bill at firefighters' request; the bill was later vetoed [43].

Twenty-two years later, the study firefighters asked for has not been done [9].

Firefighters sleep in their stations. Children sleep in their homes.

F. Why 1,500 feet? People keep hearing that antennas belong 1,500 feet from schools and homes. That number did not come from nowhere.

- **Naila, Germany.** People living within about 400 meters (1,300 feet) of a cell antenna had about three times the risk of new cancer after the antenna had run for five years, compared with people farther away. Those who got cancer got it, on average, eight years younger [10].
- **Netanya, Israel.** People living within 350 meters (about 1,150 feet) of a cell antenna had about four times the cancer rate of the country as a whole [11].
- **Where the beam lands.** In the German study, the antenna's main beam reached the ground about 350 meters (about 1,150 feet) away [10]. That is the same distance.

These were small studies of early antennas. But they found more cancer, at the same distances, in two countries. A 1,500-foot buffer covers that zone, and lawmakers keep proposing distances like it:

- **New York and New Jersey** legislators have repeatedly proposed school buffers of 1,500 and 1,800 feet [12, 13].
- **New Hampshire** legislators proposed keeping new antennas 1,640 feet from homes, parks, playgrounds, hospitals, nursing homes, day-care centers and schools [14].

In Wallington, 84% of residents live within 1,500 feet of an installation. Half live within about 1,200 feet [15].

G. The tower company will not carry the risk. Crown Castle, whose affiliate holds the Hathaway lease [36], tells its investors that if RF from equipment on its sites is "demonstrated to cause negative health effects, potential future claims could adversely affect our operations, costs or revenues." It also says it does "not maintain any significant insurance with respect to these matters" [22].

- Insurers have long excluded these risks from liability coverage [23].
- Swiss Re, one of the world's largest reinsurers, warned in 2019 that liability claims over 5G health concerns could follow [24].
- T-Mobile, which registered both Wallington structures with the FCC, also lists this as a risk to its investors [44].

If these antennas are harmless, why warn investors? Why carry no insurance? Why have insurers written the risk out of their policies?

What do they know that we do not?

A company that will not insure a risk is telling you something. A school 180 feet away has no choice but to carry it.

H. Other places are removing antennas, not just banning new ones.

- **Ripon, California (2019).** Sprint removed a cell tower from Weston Elementary School after four students were diagnosed with cancer. The district's tests had shown

the tower met federal limits [25]. **Meeting federal limits did not reassure those parents. It should not reassure us.**

- **Tarrytown, New York (2018).** A 150-foot cell tower stood next to a public housing complex and its playground. Residents objected. Three months after it went up, it came down [26]. **Wallington has a 145-foot tower in a park, 120 feet from homes. It has stood for nearly 20 years.**
- **India (2017).** Harish Chand Tiwari, who has Hodgkin's lymphoma, told India's Supreme Court that a tower within 50 meters of his home had hit it with radiation "24/7 for the past 13 years." The Court ordered the tower switched off within seven days [27].
- **Gwinnett County, Georgia (2026).** A school board approved a tower between an elementary school and a high school, then reversed itself after parents objected. One mother said: "We were not told that this was happening" [45]. **Wallington's parents were not told either: not in 2010, not in 2015, not in 2025.**
- **Rye, New Hampshire (2024).** The school board unanimously rejected a 131-foot tower about 420 feet from the elementary school. Its chair said "there has to be an absolute certainty that something we would approve has no potential health risks" [46]. **Gavlak is 180 feet from antennas. Who gave Wallington's parents that certainty?**
- **School systems** in Los Angeles (2009) and Loudoun County, Virginia (2024) opposed or banned towers on or near school grounds [47, 48]. **Connecticut** keeps new towers 250 feet from schools and day care, with narrow exceptions [49].
- **Our neighbors.** Wood-Ridge keeps antennas 500 feet from schools. Carlstadt keeps them 1,000 feet from homes and schools [50, 51]. Towns across New Jersey and the country keep antennas hundreds to thousands of feet from schools and homes [52–59] (§VI-A).

When a town tries to act on health directly, federal law stops it. In Pittsfield, Massachusetts, the board of health ordered a carrier to stop after residents reported health problems. The carrier sued, and the board withdrew its order [60]. Federal law bars towns from regulating antennas over health concerns when FCC limits are met [61].

Other communities took antennas down. Wallington's are still there, and still growing.

$6.78 per resident per year is the price we were given for carrying this risk.

What HHS should verify:

1. What did Crown Castle, T-Mobile and their insurers assess before deciding not to insure RF health claims?
2. Has any federal agency reviewed the cancer findings at 1,150 to 1,300 feet in the German and Israeli studies, and tried to repeat them with today's antennas?
3. When will a federal agency answer the court's 2021 order on children and long-term exposure?

4. Why can a school board in Georgia or New Hampshire protect its children, while a school 180 feet from antennas in New Jersey was never even told?

III. Twenty-four hours a day: children, pregnancy and everyone else (Q11a–g)

A. A day in the life of a Wallington child (Q11a). This is not a worst case. It is an ordinary school day.

- **Morning.** She walks to Gavlak Elementary (grades 3–6, more than 350 children). The water tank with antennas is 180 feet from her school. Two more installations are within half a mile. All six are within a mile.
- **The school day.** She spends 7 hours or more beside the tank. Her teachers' phones and the school Wi-Fi are on all day. A 5G antenna aims its beam at the phones it serves, so a teacher's phone can pull that beam into her classroom. Taking phones away from children does not stop that.
- **After school.** She plays on the high-school fields, entered through Gavlak, about 500–630 feet from the tank. Or at youth baseball, about 360 feet away, or the public playground, about 570 feet away.
- **Evening.** She goes home. Every home in Wallington is within half a mile of an installation. Most are within half a mile of two or more (§V).
- **Night.** She sleeps upstairs, where readings run higher (§I).
- **Tomorrow.** She does it again. 180 school days a year. Then summer, at home, inside the same concentration.

From Gavlak she goes on to the junior/senior high school (about 545 students), which has four installations within half a mile. She may spend ten school years in a row this way.

Her exposure does not reset every 30 minutes. It adds up, every day, for years.

No one has ever studied a child like her.

Her brain is still growing. The National Institute of Mental Health says "the brain finishes developing and maturing in the mid-to-late 20s." The front of the brain, which handles planning and self-control, is among the last parts to mature [62]. A Wallington child may spend 15 years or more of brain development inside this concentration. No one has measured how much RF energy a child's body takes in from several installations, all day, every day.

Schools have acted without waiting for federal answers. Districts in California, Virginia, Georgia and New Hampshire have removed, banned or rejected towers on or near school grounds [25, 45–48] (§II-H).

$6.78 per resident per year. Those districts decided their children were worth more.

B. Pregnancy, fertility and babies (Q11a, Q11b). A pregnant woman can put down a phone. She cannot move an antenna away from her school or her bedroom.

- Teachers and staff at Gavlak may spend whole pregnancies working full days 180 feet from an installation.
- Pregnant residents sleep within half a mile of several.
- Babies and toddlers spend nearly all their time at home, inside the same concentration.

Research on antennas and pregnancy is almost empty:

- **Pregnancy.** A review for the World Health Organization found only eight studies of pregnancy in the general public, of any kind. For antennas, the only measure was how far a mother lived from one. The review rated the evidence low to very low certainty [32]. A 2026 review found antenna distance in only two pregnancy studies, and concluded there was not enough evidence to draw any conclusion [33].
- **Fertility.** A review for the World Health Organization found **no study at all of men's fertility near antennas in the community**. The only studies near fixed transmitters were of workers near radar or communications transmitters. Both found lower sperm counts, poorer movement and more abnormal shapes in the exposed workers [63].
- **Young children.** In 3,102 five-year-olds, more antenna exposure at home was linked to more emotional problems, as reported by mothers [64]. In boys aged 9–11, more RF measured at home was linked to differences in behavior and verbal scores [65]. Kindergarten children were found to be exposed to many RF sources at once [66].

What no one has studied. No study has asked whether living or working within 500 feet of several antenna installations affects:

- getting pregnant;
- miscarriage;
- how long a pregnancy lasts;
- how a baby grows before birth;
- how babies and toddlers develop.

A baby develops in stages, and some stages are especially easy to disturb. A limit averaged over 30 minutes was never designed to protect them.

Wallington's pregnant teachers, pregnant residents and youngest children live in exactly the conditions no one has studied.

I ask HHS to fund:

1. A study that follows pregnancies and births, and measures exposure from antennas at home and at work, including at schools.
2. A link between state birth records (birth weight, how many weeks a pregnancy lasted, early births) and fertility outcomes and the history of nearby antennas, with privacy protections.
3. Follow-up of children born in areas crowded with antennas, through early childhood, using proven developmental tests.
4. Separate measurement of magnetic fields from electrical equipment, which IARC also lists as possibly causing cancer [3].

C. Adults who work from home (Q10b, Q11e). I worked from home beside the Hathaway monopole for six years. Since 2020, many more people work from home. For us there is no commute away from the antennas, no office across town, no hours off. Day, evening and night are all spent in the same place.

Other adults leave during the day, often for city workplaces with even more antennas, then come home to a town where every resident lives within half a mile of an installation. For them, too, there are no off-hours. Maintenance and roofing workers on the self-storage and apartment rooftops work right beside antennas, and their exposure needs its own assessment.

D. Living under a rooftop site (Q11g, Q15a). Residents of 211 Paterson Avenue, a four-story apartment building, live directly under eight panel antennas.

People usually talk only about the radio waves from rooftop antennas. But a rooftop site also brings its power equipment into the building: radio units, power converters, batteries, cooling, and the electrical cables that feed them. Magnetic fields from that equipment drop off quickly with distance.

For a top-floor family sleeping under that equipment, the distance is a ceiling.

IARC lists these magnetic fields as possibly causing cancer, because pooled studies found about double the childhood leukemia risk above 4 mG on average [3, 21]. FCC limits cover radio waves only. No federal limit applies to these magnetic fields in homes [67]. Wallington's code requires RF readings only.

No one knows whether the antennas also send signal down into the top-floor units. No measurement of either kind exists inside any apartment under a Wallington rooftop installation. Of the 3,463 public comments in this docket through October 17, only a handful describe living or working under rooftop equipment.

Recommendation: in apartment buildings that carry antennas, measure RF and magnetic fields in the units closest to the equipment (top floors, and units beside cable runs and equipment rooms), before the antennas are turned on and after every change, and give the results to the residents.

E. Other people at risk (Q11c, d, f, g):

- older adults and people with health conditions who spend most of the day at home;
- people already living with cancer, like me, who want to know what they are still exposed to;
- residents of buildings that carry antennas or face them across the street;
- people with pacemakers and other implanted medical devices, a question for the FDA.

F. Wallington is not alone. Parents in this docket describe towers at or beside:

- Sprucewood Elementary in Sandy, Utah [68];
- Vineyards Elementary in Naples, Florida [69];
- a pre-K/3-K center in Glendale, Queens, facing rooftop equipment, with a new tower and a streetlight antenna on the same block [70];

- a middle school 50 meters (about 165 feet) from a cluster of 5G antennas [71].

Other parents report paying more for daycare, or driving farther, to avoid towers [72, 73]. Those parents are carrying the same worry we are, and paying for it.

Gavlak has no setback, no published reading and no notice.

What HHS should verify:

1. How much RF reaches Gavlak's classrooms on each floor, during a normal school day with staff phones and Wi-Fi on?
2. How much reaches the fields and playground where children play after school?
3. Adding school and home together, what is a Wallington child's total exposure over a day, a year, and ten years?
4. How many Gavlak staff have been pregnant while working there since antennas went on the tank?
5. What RF and magnetic fields reach the top-floor apartments at 211 Paterson Avenue?

IV. What studies of fixed antennas found (Q6, Q12–Q14)

Much research is about phones held against the body. That is a different exposure, and this report does not rely on it. This report is about fixed antennas that residents do not choose and cannot turn off.

A. What studies near fixed antennas concluded:

- **Cancer.** In Germany, people living within about 1,300 feet of a cell antenna had about three times the risk of new cancer after five years of operation, and got cancer about eight years younger. In Israel, people within about 1,150 feet had about four times the cancer rate of the country as a whole [10, 11] (§II-F).
- **Symptoms.** Adults with more RF measured in their bedrooms reported more headaches and other symptoms [74]. In a 2025 study, residents with more RF measured inside their homes reported more symptoms, including anxiety, memory problems and joint pain [19].
- **Thinking and memory.** Students at the school with more RF (about 100 vs. 20 mW/m^2) scored lower on memory and motor tests [20].
- **DNA damage.** Schoolchildren with more RF at school (up to about 2 mW/m^2) had more micronuclei in their cheek cells. Micronuclei are markers of DNA damage [18]. DNA damage is one of the ways cancer begins.
- **Behavior and emotions.** Boys aged 9–11 with more RF at home showed differences in behavior and verbal scores [65]. Five-year-olds with more antenna exposure at home had more emotional problems, as reported by their mothers [64].
- **Leukemia.** Children whose homes averaged above 4 mG of magnetic field had about double the risk of leukemia [21].

These findings came at about 2–100 mW/m^2 [18–20]. That is 50 to 5,000 times below FCC limits [16].

My readings in neighbors' homes and in the park fall inside that range (§I).

A test that only asks "is it under the FCC limit?" cannot answer the questions these studies raise.

What no one has studied:

- children exposed for years, at home and at school, to several sources at once [31];
- common adult cancers, such as colorectal cancer, near fixed antennas with measured exposure. A review for the World Health Organization found no usable studies of fixed sites for key adult cancers [75].

That is exactly Wallington's situation.

Federal law forbids the Borough to weigh health when antennas go up or are upgraded [61, 76]. Not one of the six installations is 500 feet from homes or schools. No public record shows the planning review the Borough's own code requires [29].

Residents live with an exposure no one measured, near a school no one notified, under a standard no one has updated.

And the benefit to each resident is $6.78 a year.

B. Beams go where people are. People often say cell antennas point outward, toward the horizon, so people nearby are safe. That leaves out three things.

1. **Antennas are tilted down.** Panels are angled toward the ground, so the main beam lands on the ground, and on upper floors, some distance from the tower. In the German study, the main beam reached the ground about 350 meters (about 1,150 feet) from the antenna [10]. That is inside the zone where the extra cancers were found.
2. **Lower antennas bring the beam closer.** At the Hathaway monopole, the lower tier's four large panels sit about halfway up, around 72 feet, not at the 145-foot top. By simple geometry, at the usual 6–8° tilt, their main beam reaches second- and third-floor bedrooms about **340 to 550 feet** from the tower. The top antennas reach the same floors about 825 to 1,800 feet out. Together, the two tiers sweep upper floors from a few hundred feet to a third of a mile away. About 2,250 Wallington residents live in census blocks centered 400 to 1,300 feet from the tower [15]. Homes closer in, including those 120 feet away, sit below the main beam but get side signal from very close range. Readings near the base reached 20–33 mW/m² (§I).
3. **5G beams follow people.** 5G antennas aim beams at the phones and devices they serve, wherever they are: down to the street, into classrooms, into upper-floor bedrooms. They also sweep signal beams across the whole area they cover. International measurement standards already include methods for this [77]. Older 4G antennas do not aim, but they are still the biggest source at many sites [78]. "Pointing outward" does not reduce them either.

These are estimates, because the real tilts, directions and power have never been made public. With those numbers, anyone could check them in minutes.

Wallington has never been measured under any of these conditions.

C. Technology (Q13a, c, k). Results from studies of older networks [10, 11] cannot simply be applied to today's 4G and 5G networks. At 5G sites in the UK, 4G was still the biggest source [78], so any survey must cover every band. What transmits in Wallington includes:

- cell service (which generation is not public);
- licensed microwave links at two sites [79];
- a 2015 lease on the water tank to a company that builds private wireless links between trading data centers [80, 81];
- two-way radio and school Wi-Fi.

Smart utility meters and other transmitters inside homes add more sources that no one counts.

D. Environment (Q14). Two installations stand in or beside public green space: Hathaway Street Park, on the Passaic River, and the school fields. The FCC is itself taking comment on the environmental record [7]. No one has recorded the natural environment around them. Any federal study should include clear ecological measures in parks beside installations.

What HHS should verify:

1. What are the tilts, directions and power of each antenna tier at the Hathaway monopole?
2. Which homes and which floors sit in the main beam of each tier?
3. Which installations in Wallington use 5G antennas that aim beams at users?
4. Do RF levels in Wallington homes and classrooms fall within the 2–100 mW/m² range where these studies found effects?
5. Why has no federal agency repeated the German and Israeli cancer studies with today's antennas?

V. The tower you see, and the antennas you don't: six installations in one square mile (Q13, Q15a–d)

Wallington does not have one tower. It has six antenna installations, packed into 0.99 square miles where about 12,000 people live.

Ask anyone in town and they will point to the tower in Hathaway Street Park. Almost no one can name the other five. They are on a water tank 180 feet from an elementary school, on the roof of an apartment building where families sleep under them, on a self-storage building at the entrance to town, on an old water tower, and on a chimney just across the town line. Together they carry more than 70 panels, plus square units and other equipment no one has explained.

One tower is what people see. Six installations is what they live with.

A. How I counted.

- **Where each site is:** GPS coordinates, FCC registration records [30, 35] and the Census geocoder [15]. I checked which town each site is in.
- **Distances:** straight-line distances.
- **Antennas:** counted by eye from public places.
- **People and homes:** every one of Wallington's 113 Census blocks from 2020 (11,868 residents, 5,108 homes), measured from the center of each block to all six sites [15]. These numbers show how close people live. They are not exposure measurements.

B. The town. Wallington has about 11,900 people per square mile. About 1 in 5 residents (19.6%) is under 18. Two out of three (65%) speak a language other than English at home [15]. Parts of the borough are officially designated Overburdened Communities under New Jersey's Environmental Justice Law [82].

C. The six installations.

#	Where	What it sits on	Antennas	Closest neighbors	Record
1	Hathaway Street Park	145-ft monopole in a public park	12 rectangular panels and 8 square units, on two tiers	Homes 120 ft away	FCC 1257356; second carrier added 2021 [35, 36]
2	1 Reservoir Avenue	Borough water tank	8 panels; tank leased to a second operator in 2015	Gavlak Elementary, 180 ft	FCC 1277025; FAA 2025-AEA-8476-OE; changed Dec. 2025 [30, 80]
3	211 Paterson Avenue	Four-story apartment building	8 panels	Residents live right under them	Visible in street photos by 2007
4	460 Main Avenue	Old industrial water tower, "being utilized as an antenna tower for wireless communications providers" [83]	8 or more panels, plus other equipment	Homes about 500 ft away	Microwave licenses 2007–2021 [79]; named in a 2019 court case [84]
5	27 8th Street, Passaic	Chimney just across the town line	16 panels	High school about 1,050 ft away	Town confirmed [15]
6	3 Curie Avenue	Self-storage roof, about 30 ft up	About two dozen, in groups of 3–4	Apartment building 120 ft across the street	Visible before 2007; FCC microwave filing, Dec. 2010 [79]

Together: more than 70 panel antennas, plus square units and other equipment no one has explained.

Two of the six stand at the entrances to town. At one, Ordinance 21 would allow data centers and a 150-foot tower. At the other, the self-storage roof carries about two dozen antennas. It is the first thing people see when they arrive.

D. How close everyone lives.

No one in Wallington lives more than half a mile from an installation.

Wallington homes compared with the distances other places protect [12–15, 29, 50, 51]:

Distance from an installation	Homes inside it (of 5,108)	People inside it (of 11,868)	Who protects this distance
500 ft	about 640 (12%)	about 1,580 (13%)	Wallington's own rule; Wood-Ridge for schools, applied to antennas
1,000 ft	about 1,680 (33%)	about 4,080 (34%)	Carlstadt, from homes and schools
1,500 ft	about 4,240 (83%)	about 9,950 (84%)	School buffer proposed by New York and New Jersey legislators
1,640 ft	—	—	Proposed in New Hampshire, from homes, parks, playgrounds and schools

Wallington residents by how many installations are near them [15]:

Distance	Near at least 1	Near 2 or more	Near 3 or more	Near 4 or more
1,000 ft	34%	2%	—	—
1,500 ft	84%	18%	—	—
Half a mile	**100%**	**82%**	**52%**	**28%**
One mile	100%	100%	100%	**100%**

Wallington homes near each installation:

Installation	Within 500 ft	Within 1,500 ft
Reservoir water tank (by Gavlak)	193	1,280
Hathaway monopole	163	1,298
460 Main water tower	143	618
211 Paterson rooftop	125	752
3 Curie rooftop	13	332
Passaic chimney	0*	847

*The homes within 500 feet of the chimney are on the Passaic side, so they are not counted here.

Distances between the installations (feet):

	Hathaway	Reservoir	Paterson	460 Main	Passaic	Curie
Hathaway	—	2,922	2,896	4,073	**805**	5,861
Reservoir	2,922	—	3,222	**2,042**	**2,209**	4,159
Paterson	2,896	3,222	—	5,222	3,019	3,482
460 Main	4,073	2,042	5,222	—	3,272	5,880
Passaic	805	2,209	3,019	3,272	—	5,573
Curie	5,861	4,159	3,482	5,880	5,573	—

More findings:

- 57% of residents live within one mile of all six.
- No populated block is more than about 2,140 feet from an installation.
- Half of all residents live within about 1,200 feet of one.
- 93% live within half a mile of one of the four on private property. 87% live within half a mile of one of the two on Borough property.

The schools sit in the middle of it all:

- **Gavlak Elementary:** 180 feet from the water tank, with two more installations about 2,000–2,200 feet away.
- **The junior/senior high school:** four installations within half a mile (the chimney about 1,050 ft, the water tank about 1,160 ft, Hathaway about 1,780 ft, 460 Main about 2,540 ft).
- **Both schools:** all six within a mile.

There is no place in Wallington away from these antennas. Not at school. Not at home. Not in the park.

E. Inside 500 feet, and inside 250 feet. Wallington's own code chose 500 feet as the safe distance from schools and homes [29]. About 1,600 Wallington residents, in about 640 homes, live inside it. Counting every Census block that touches a 500-foot circle, the number could be as high as 2,500 in Wallington, and 3,700 including the next towns [15].

At 250 feet, half that distance:

- **Gavlak Elementary**, with more than 350 children aged 8 to 12, plus teachers and staff, is **180 feet** from the water tank.
- The nearest homes are **120 feet** from the park monopole.
- An apartment building is **120 feet** across the street from the Curie Avenue rooftop.
- The people in a four-story apartment building on Paterson Avenue live **directly under** eight panel antennas.

Census blocks touching 250-foot circles around the six sites hold up to about 1,700 Wallington residents, and 2,300 people in all [15]. The children at Gavlak are not even counted in those numbers. They come every school day.

F. What people cannot see. Everyone notices a tower. Few notice antennas on a water tank, an apartment roof, an old water tower, a chimney or a storage building. Five of the six are exactly that.

You may see a tower 2,000 feet away and never notice the antennas much closer to your home. Home buyers do notice.

A tower is easy to see, and easy to object to. Antennas bolted to a water tank, a roof or a chimney are easy to miss. In Wallington they were added one at a time, over 20 years, and not one of them was held to the Borough's own 500-foot rule (§VI-A).

This is not one tower that slipped through. It is a whole town's worth of antennas that no rule ever reached.

A parent walking a child into Gavlak sees a water tank. A family on the top floor of 211 Paterson Avenue sees a ceiling. A resident looking out a window sees the park tower in the distance, and not the panels much closer. None of them was told what any of it sends into their homes.

People have a right to know what is near them: which antennas, which companies, which frequencies, how much power, which way they point, and since when. Today no one can find out:

- One panel can carry several frequencies, and one site can host several companies. Cellular licenses cover whole areas, not single sites, so no public FCC record lists what transmits from a given site [30, 35].
- An FCC tower registration describes the structure itself (its height, location and lights), not the antennas on it [85].
- At 460 Main Avenue, the old water tower carries panels and other equipment that cannot be identified from the ground. It has held microwave licenses [79]. No public record says what runs there today.
- At the Hathaway monopole, square units of unknown purpose sit beside the panels on both tiers.

G. How it grew: 25 years, one square mile.

Date	What happened	500-ft setback applied?	Residents or school told?	Ref.
Sept. 27, 2001	Ordinance 2001-16 adopted: 500-ft setback, antenna inventory, site-plan review, yearly RF readings	—	—	[29]
Apr. 21, 2003	Hathaway monopole ground lease	No	Not that anyone knows	[36]
Feb. 28, 2007	Hathaway monopole registered with the FCC	No	Not that anyone knows	[35]
By 2007	Paterson Ave and Curie Ave antennas visible; 11 GHz microwave licensed at Main Ave	No	Not that anyone knows	[79]
Dec. 2010	Antennas built on the water tank, 180 ft from Gavlak	**No**	**School and parents not told**	[30]
Dec. 13, 2010	FCC microwave filing at Curie Ave	No	Not that anyone knows	[79]
Jan. 14, 2013	Hathaway changes owners; construction notice	No	Not that anyone knows	[35]
Apr. 9 and May 18, 2015	Hathaway modified	No	Not that anyone knows	[35]
June 25 and July 30, 2015	Borough leases the water tank to a second operator, McKay Brothers LLC	**No**	**School and parents not told**	[80]
Oct. 9, 2018	Carrier equipment update on an existing tower; the minutes do not say which	No	Not that anyone knows	[86]

Date	What happened	500-ft setback applied?	Residents or school told?	Ref.
2020–2021	22 GHz microwave licensed at Main Ave	No	Not that anyone knows	[79]
Nov.–Dec. 2021	Borough lets another carrier (Dish) onto the Hathaway monopole	No	Not that anyone knows	[36]
Jan. 19, 2023	"Potential transactions involving cell-tower property" taken into closed session	—	—	[86]
July 18, 2023; Aug. 28, 2024	Planning Board: the tower in the Main Avenue redevelopment area stays, and more antennas can be added	No	Not that anyone knows	[87]
Sept.–Dec. 2025	FAA study, then the water tank's FCC record changed (Dec. 8, 2025)	**No**	**School and parents not told**	[30]
Aug. 13, 2026	Ordinance 21 introduced: data centers and a 150-ft tower 250 ft from residential zones	—	Residents have publicly opposed it	[83]
Oct. 8, 2026	Ordinance 23 adopted: $1.32 million for parks, including Hathaway Street Park	—	—	[88]

In 25 years, the 500-foot setback was never applied. Not once.

The public record shows no RF measurement, no antenna inventory, no site-plan review and no notice to residents, the school or parents at any step. That includes the water tank next to an elementary school: antennas since 2010, a second operator in 2015, a change in 2025.

What HHS should verify:

1. What equipment, from which companies, runs at each of the six sites today?
2. When was each piece activated or changed?
3. Did any site ever go through the site-plan review and antenna inventory the code requires?
4. Was anyone at Gavlak or in the school district told about the 2010, 2015 or 2025 work on the tank?

VI. Setbacks, the public record, money, home values and taxes (Q5n, Q9, Q15a, Q18)

A. Not one protection was applied. In other towns, people fight over a single tower. Wallington has six installations and more than 70 panels in one square mile.

Here is what Wallington's own code promises, and what the public record shows for the six [29]:

Protection	What the code says	Applied to any of the six?
500-foot setback from schools and homes	§365-83(D)(4)	**No.** It covers only new freestanding towers that need a special permit.

Protection	What the code says	Applied to any of the six?
Antenna inventory from every applicant	§365-81(C): existing antennas and sites in Wallington and within three miles, "including specific information about the location, height and design of each tower"	**No public record**
Planning Board site-plan review	§365-88: any wireless tower or antenna, anywhere in town	**No public record**
Certified RF readings	§365-89(A): "within 90 days of beginning operations and at annual intervals," "signed and certified by a radio frequency engineer"	**No public record**
Older sites lose their exemption when changed	§365-80(C): when enlarged, changed or added to	**No public record**, despite changes in 2015, 2021 and 2025
Notice to residents, parents or the school	—	**None known**

Six installations. More than 70 panels. Twenty years. As far as any public record shows, not one protection in Wallington's own code was applied to any of them.

What we are seeing in Wallington is hard to believe. Many towns argue for years over one proposed tower. Here, antennas went onto a water tank 180 feet from an elementary school, onto an apartment roof above sleeping families, onto a storage building, an old water tower and a chimney. As far as the record shows, each one went up without a setback, an inventory, a review, a reading or a word to the people living beside it.

Here is how the setback missed every one:

- Antennas on Borough property, including the park monopole and the water tank next to Gavlak, are allowed with no setback at all (§365-82(B)(1)) [29].
- Antennas on buildings fall under other rules.
- The chimney is in Passaic, outside Wallington's control.

The rule was written for towers. The antennas went everywhere else.

An antenna 180 feet from a school is no farther away because it sits on a water tank instead of a pole.

What our neighbors and other New Jersey towns require:

Town	Relation to Wallington	From schools	From homes	Between towers	Covers	Ref.
Wood-Ridge	Next door	500 ft	300 ft from residential zones	—	**Antennas and towers**	[50]
Carlstadt	Next door	1,000 ft	1,000 ft; none in residential zones	—	Towers and antennas	[51]
Hasbrouck Heights	Nearby	400 ft	400 ft, plus parks, playgrounds, child care	—	Antennas and towers	[52]
Hillsborough	New Jersey	2,000 ft	1,000 ft from home property lines	1 mile	Antennas and new towers	[53]

Town	Relation to Wallington	From schools	From homes	Between towers	Covers	Ref.
Plainsboro	New Jersey	Not allowed on school land	1,000 ft from home property lines	—	New towers	[54]
Montville	New Jersey	—	None in residential zones	1,500 ft	Towers	[55]
Maple Shade	New Jersey	200 ft	200 ft	1,500 ft	Towers	[56]
Nutley	New Jersey	—	—	1,500 ft	Towers	[57]
Wallington	—	500 ft	500 ft from residential zones	1,000 ft	**New special-permit towers only: none of the six**	[29]

Measured against these rules:

- **Wood-Ridge:** the water tank, 180 feet from Gavlak, would fail.
- **Carlstadt and Hasbrouck Heights:** at least five of the six would fail.
- **Hillsborough:** all six would fail. Every one is within 1,000 feet of homes, the tank is within 2,000 feet of two public schools, and every installation has another within a mile.

Exposure depends on where antennas are, not on what they are mounted on.

More is on the way. Ordinance 21, introduced on August 13, 2026, covers 33.46 acres at 460–520 Main Avenue, at one entrance to town. It would allow data centers with their electrical equipment, and one tower up to 150 feet tall, only 250 feet from residential zones [83].

That is half of Wallington's own rule.

Residents have publicly opposed it. Its advertised September 17 hearing was not held, and it is still unresolved [83].

B. What the code promised. Ordinance 2001-16, Chapter 365, Article IX of the Borough Code [29], says it exists to (§365-78):

- "protect residential areas and land uses from potential adverse impacts of towers and antennas";
- "encourage the location of towers in nonresidential areas";
- "minimize the total number of towers throughout the community";
- "consider the public health and safety of communication towers."

No public record shows that health or safety was considered for any of the six.

The inventory rule, in full (§365-81(C)): "Each applicant for an antenna and/or tower shall provide to the Construction Official an inventory of its existing towers, antennas, or sites approved for towers or antennas that are either within the jurisdiction of the Borough of Wallington or within three miles of the border thereof, including specific information about the location, height and design of each tower."

If the companies filed these inventories, the Borough would already know what stands on each of the six sites. No public record shows that it does.

Older installations lose their exemption when they are enlarged, changed or added to (§365-80(C)) [29]. The Hathaway monopole was changed in 2015 and got another carrier in 2021 [35, 36]. The water tank was changed in December 2025 [30].

None of the required records is public. Perhaps none exist.

My records requests keep being delayed, even after I asked residents online to help find antennas near them. The latest reply: the Borough is still trying to locate the records. These records should have been public for 20 years.

C. What the record shows, and what it hides. Wallington's public records show 23 years of decisions about antennas:

Date	Who	What the record shows	Ref.
Apr. 21, 2003	Borough	Ground lease for the Hathaway Street Park monopole	[36]
June 25 and July 30, 2015	Mayor and Council	McKay Brothers LLC asks to use the water tank, then gets a lease for antennas at $27,500 a year, rising 3% a year. McKay Brothers builds private wireless links between New Jersey trading data centers [81]. The tank is 180 feet from Gavlak.	[80]
Oct. 9, 2018	Mayor and Council	A carrier's plan to update equipment on an existing tower; no objection from the Borough Engineer; Mayor to sign. The tower is not named.	[86]
Nov.–Dec. 2021	Mayor and Council	Resolution 2021-178 lets Dish Network onto the Hathaway monopole. The Borough gets 50% of what extra carriers pay.	[36]
Jan. 19, 2023	Mayor and Council	"Potential transactions involving cell-tower property" taken into closed session	[86]
July 18, 2023; Aug. 28, 2024	Planning Board	The tower in the Main Avenue redevelopment area stays; more antennas can be added under FCC rules	[87]
Aug. 13, 2026	Mayor and Council	Ordinance 21 introduced. The plan says the old water tower on the site is "being utilized as an antenna tower for wireless communications providers."	[83]
Sept. 15–17, 2026	Planning Board; Mayor and Council	Review not finished; the advertised public hearing not held	[83]

A 2019 New Jersey appeals court opinion separately records testimony that a phone was "hitting off a cell tower at 460 Main Avenue in Wallington" [84].

The decisions are public. What was installed is not.

None of these decisions comes with a public site plan, antenna inventory or RF reading [29]. A parent, a teacher, or the school itself cannot learn what transmits from the tank 180 feet from Gavlak, how many companies share it, or what changed in 2015, 2021 and 2025.

Even when no public hearing is needed, the law expects a paper trail. New Jersey lets antennas be added without site-plan review only if the structure had all its approvals and

the work makes it no more than 10% taller [89]. The FCC record for the tank, granted December 8, 2025, lists it at 27.4 meters (89.9 feet). Earlier records list 24.4 meters. That is 12% taller [30]. An FAA study came first; federal rules require FAA notice before certain construction or changes near airports [90].

No public record explains the difference, or shows the approvals that would make the work exempt.

Even a telecommunications workers' organization that does not presume today's limits are unsafe supports "enhanced disclosure of modeled and measured exposure conditions" at schools and child care, and a new exposure check whenever antennas, power or beams change [91]. Neither happened at the tank by Gavlak.

New Jersey law allows leases and property deals to be discussed in closed session [92]. That is not the issue. The leases are public. What the antennas send into homes and classrooms is not.

D. Risk versus benefit.

- **What the Borough gets.** In 2024 the Borough collected just $80,408.85 in tower rent [28], from the two installations on its own property. That is about $40,000 per installation, or $6.78 per resident per year.
- **And it is shrinking.** The Borough received $75,442.36 in 2025 and budgets $74,268 for 2026 [93].
- **What residents get from the other four.** Nothing. Their rent goes to private owners. Yet 93% of residents live within half a mile of one of them [15].

$6.78 per resident per year, against a school of 350 children 180 feet from antennas.

Over six years, about $41 per resident. That is what my six years beside the tower were worth to the town. I am the one left with cancer, and with the worry.

Even the company that holds the Hathaway lease tells its investors it has no significant insurance against RF health claims (§II-G). The Borough took the rent. The company kept the profit. Residents kept the risk.

E. Home values and taxes. Wallington is a beautiful town, with rich history, nature by the river, and easy access to New York. Its home prices do not show it.

Many families I know refuse to live next to these antennas. Residents tell me homes near them are hard to sell at a normal price. Buyers who care can find antennas on maps in minutes, and the more people learn about the health questions, the bigger the problem gets.

The research agrees. In a study of 142,161 Kentucky home sales, a home with a visible antenna 1,000 feet away sold for 1.82% less than a similar home 4,500 feet away [34].

No Wallington home is 4,500 feet from an installation. About 1,680 are within 1,000 feet [15].

Here is what that means in dollars. On a $400,000 home, 1.82% is $7,280. At $6.78 a year in tower rent, a resident would need more than 1,000 years to earn that back.

About $80,000 a year in rent, against the value of every home in town.

Lower sale prices do not stay with the seller. When homes sell for less, assessments follow. The Borough still needs the same budget, so the tax rate rises for everyone, including families nowhere near an antenna. A town that needs every tax dollar keeps allowing antennas that drive buyers away.

The cost is not only in dollars. A family that cannot sell cannot move away from an antenna, even if they want to.

F. $1.32 million for the park around the monopole (Q9, Q11a, Q15a–b). On October 8, 2026, the Borough adopted Ordinance 23. It spends $1,320,000 on two parks damaged by Tropical Storm Ida: riverbank work at Hathaway Street Park and repairs at Crescent Park [88]. Of the $655,664.50 in FEMA reserves it uses, $600,923.95 (92%) is for Hathaway Street Park [88, 94].

That is the park where the monopole stands, where I took the readings in §I, and where I no longer take my child.

The Borough is spending public money to bring families back to a park, without telling them what reaches the playground.

No RF reading has been published for the playground, the rink or the homes around them [29]. When people believe a site is unsafe and no one measures it, they stop using the space. Children lose the park. Whether antennas keep families away from parks, playgrounds and school grounds is a public-health question no one has studied (§IX, Project K).

Ordinance 21 would add data centers, substations, transformers, generators, batteries and a 150-foot tower on 33.46 acres at 460–520 Main Avenue [83]. That piles new electrical and radio sources into the same square mile, with no look at the total and no notice to the people nearby. **The total should be studied before approval, not after.**

G. Who is responsible? Federal law stops towns from regulating antennas over health concerns when FCC limits are met [61], and forces them to approve most upgrades [76]. The FCC sets limits but does not study health. The Borough did not apply its own code. The tower company warns its investors but does not insure against the risk.

Now the FCC is considering whether to go further: to throw out local setback rules as unlawful and to limit local RF testing [95].

If that happens, no level of government will look at what reaches children at home and at school. The health answer has to come from HHS.

H. What is coming next. New York City is putting 32-foot "Link5G" poles on residential sidewalks: more than 150 since 2022, with about 2,000 more planned. At least 16 community boards, representing about two million New Yorkers, have objected [96].

Antennas are moving down to street level, next to windows, before anyone has studied the people who live beside them.

Wallington shows where that leads: a town where no one lives more than half a mile from an installation.

I. Fairness. Parts of Wallington, including blocks near Gavlak and the park monopole, are designated Overburdened Communities under New Jersey law [82]. Two out of three residents speak a language other than English at home [15]. No notice is known to have reached residents, in any language. HHS should ask whether siting protections, and therefore exposure, fall unequally on communities like this one (Q11g, Q16).

J. Inside 500 feet: no notice, no information, no health tracking. For the 640 homes and the school inside the Borough's own 500-foot distance, three questions have the same answer.

- **Were they told?** No. No notice of any installation or change is known to have reached residents, the school or parents. That includes the water tank next to Gavlak.
- **Can they find out what is there?** No. The companies, frequencies and power are not public, and neither are the required RF readings [29]. People cannot judge a risk they cannot see.
- **Is anyone tracking their health?** No. No health check was offered before the antennas went up, and none since. Studies of people living near antennas have reported headaches, sleep problems, fatigue and trouble concentrating where measured exposure was higher [19, 74]. These complaints are easy to blame on something else. Cancer can take years to show. Unless the people inside 500 feet are studied, and their exposure measured, no one will ever connect their illnesses to where they live.

Each illness is treated one patient at a time. The pattern, if there is one, is never seen.

I know this from the inside. When a cancer is diagnosed, the chart records the patient. It does not record the antennas down the street.

I ask HHS to fund a voluntary, confidential, ethics-approved health program for residents and school staff living or working within 500 feet of more than one installation, compared with people farther away. It should include standard symptom and sleep questionnaires, links to cancer and birth registries, exposure measured at each person's home and workplace, and, for children, only non-invasive measures with parental consent.

What HHS should verify:

1. Why did Wallington's 500-foot rule reach none of the six installations?
2. Were the inventory, site plans and yearly RF readings ever filed? Where are they?
3. Was the December 2025 work on the tank more than 10% of its height, and was it approved?
4. How much rent does each site earn, and who receives it?

5. Have home values near these sites lagged the rest of town, and what has that cost the tax base?

VII. Old limits, missing measurements and the right to know (Q5n–p, Q7–Q9)

A. The limits are 30 years old. The FCC set today's exposure limits in 1996. It kept them unchanged in 2019 [17].

- In 1997 the United States had about 51,600 cell sites.
- By 2021 it had about 418,900. That is about eight times as many [97].

Today's networks add 4G, 5G, several bands per antenna, beams that aim at users, microwave links and small antennas at street level.

The limits have not changed.

B. What the limits measure, and what they don't.

- **They average. They do not add up.** FCC limits for the public are averaged over 30 minutes. The FCC says they apply to "continuous exposure, that is, for indefinite time periods" [16]. A person can be exposed just under the limit every 30 minutes, 24 hours a day, for years, and it still counts as safe. The limit is a ceiling for each half hour. It does not count hours, years of living nearby, or a childhood spent inside the field.
- **They guard against heat, not long-term harm.** The limits are built mainly to stop body tissue from heating up in the short term. International guidelines from 2020 are built the same way [98]. They were not built to answer the question IARC raised: cancer [2].
- **A court found gaps.** A federal appeals court found the FCC never properly explained why its limits protect against harms other than cancer, including for children and long-term exposure [7].
- **Wallington's reality.** Children spend 7–9 hours at school beside an installation, then go home to a town with no place free of antennas. Adults who work from home never leave. The exposure is close to nonstop, for years.

A 30-minute limit was never designed for a childhood. Or for six years of working from home beside a tower.

C. When several antennas add up [99]. When several transmitters reach the same spot, the FCC adds them together, each as a share of its own limit. If the total is at or under 100%, the spot passes. If it is over, the companies that each add more than 5% share the blame.

Here is what that rule does not do:

- It checks one 30-minute snapshot, not days or years.
- It asks only whether the total stays under the limit, not what the total means for health.

- Under the limit, nothing requires the total to be measured in a bedroom or a classroom, published, or shared with residents.

In Wallington, six installations add up at every home and classroom. Time adds the years on top.

No one has measured either total.

D. What Wallington's own reading rule misses. The Borough code (§365-89) asks only for RF readings "within 90 days of beginning operations and at annual intervals," certified by an engineer [29]. Even if those readings existed, the code does not say:

- where they are taken;
- whether every company and band is included;
- whether they are repeated after changes;
- whether anyone independent checks them;
- whether the public sees them.

Two sources are missing entirely:

- **Microwave.** Wallington's own code covers all radio frequencies up to 300,000 MHz [29]. Yet the microwave links licensed here at 11 and 22 GHz [79] are the kind most often left out of reports, and common meters stop near 6 GHz.
- **Magnetic fields from electrical equipment.** There is no federal limit on public exposure to these fields [67], even though IARC lists them as possibly causing cancer [3]. No local rule requires measuring the electrical equipment that powers antennas in parks, on rooftops and beside schools. That is where my readings at the park reached 45 mG.

E. What has, and has not, been measured in Wallington.

Measurement	Needed?	Exists for Wallington?
Readings before each installation went up	Yes	None
Yearly certified readings (§365-89)	Yes	None public
Readings after changes (2015, 2021, 2025)	Yes	None available
Every company and band, measured separately	Yes	None
Microwave links above 6 GHz	Yes	None
Classrooms, playgrounds, athletic fields	Yes	None (only my readings in the park)
Bedrooms and upper floors	Yes	None (only my readings in neighbors' homes)
All six installations combined, at homes and schools	Yes	None
Magnetic fields near electrical equipment	Yes	None (only my readings)
Any result posted for the public	Yes	None

Twenty years of antennas. Zero public measurements.

Even the strongest comment against concern in this docket calls its main measurement study "neither a health outcome study nor proof of compliance at every tower" [100]. Readings at UK sites cannot tell Wallington what reaches its classrooms and bedrooms.

F. Distance, not monitoring, is the protection (Q5, Q15). Exposure from a modern installation changes by band, by beam, by traffic, and by the walls, windows and floors between the antenna and a person.

- A sensor that misses bands, sits in the wrong place or averages away short bursts gives false reassurance.
- When the company installs or pays for the sensor, the company also chooses what gets measured.
- No measurement taken now can bring back the 20 years when none was taken.

Monitoring will not erase 20 years with no measurements. Distance will protect the next 20.

The protection Wallington wrote in 2001 was distance: 500 feet. It was never applied. The cancer studies point to distances of 1,150 to 1,300 feet (§II-F).

$6.78 per resident per year does not justify keeping antennas 180 feet from a school.

Recommendations:

1. HHS should state the health basis for minimum distances between fixed antennas and schools, child care and homes, and tell the FCC, which is considering throwing out local setback rules [95].
2. HHS should recommend moving installations that stand inside those distances from schools and homes, starting with those on public property.
3. Where research needs measurements, independent professionals with no money ties to the companies should take them, band by band, with each location chosen with the building in mind, and every location and condition published.

G. How a research study should measure (Q7–8). Keep two things separate: a compliance check at one place and time, and a person's exposure history over years.

1. List every source within at least 1.4 km (about 0.9 miles) of each school and home, across town lines [101].
2. Get each antenna's details, with the dates it was turned on and changed.
3. Measure with calibrated meters, band by band, under international standards IEC 62232 and ITU-T K.100 [77], including microwave bands above 6 GHz. Measure classrooms on each floor, fields, playgrounds, and homes on every floor, especially upper-floor bedrooms and apartments level with or facing antennas. Measure classrooms during a normal school day, with staff phones and Wi-Fi on, so beams aimed into the room are captured.
4. Report averages and short bursts separately, with paired readings against a shielded control and the meter's lowest reading [38].

5. Measure during school hours, evenings, nights and weekends, and again after every change.
6. Measure magnetic fields near electrical equipment and where children play.
7. Rebuild past exposure from records of equipment changes, so each person's years of exposure can be estimated.

H. People have a right to know (Q9).

People have a right to know which antennas, companies, frequencies and power levels are near their homes and their children's schools.

Federal agencies, working with the FCC, should support a public registry that records, for each site and each direction it faces:

- which company runs it and on which bands;
- antenna height, direction and tilt;
- maximum power;
- the dates it was turned on and changed;
- the combined-source safety check.

For tall structures with several tiers, like the Hathaway monopole, the height, tilt and direction of each tier, and the company that owns each unit, must be public. Those numbers decide which homes and floors sit in the main beam.

Schools, parents and residents should be told about new installations and changes nearby, in the languages residents speak, before work begins.

What HHS should verify:

1. Has any certified RF reading for any Wallington installation ever been filed? Where?
2. Did any reading include the microwave links above 6 GHz?
3. What is the combined exposure from all six installations at Gavlak and at the homes closest to the Hathaway monopole?
4. What distance from schools and homes would the evidence support, and which of the six installations fall inside it?
5. Why can a parent learn a lease amount, but not what the antennas send into a classroom?

VIII. Who is living with cancer now? (Q4, Q10a–h)

Neighbors living near these installations have told me about serious illnesses, including cancer. I have no access to their records, and I make no count.

Wallington's Board of Health counts cancer deaths [102]. That is not enough.

Cancer takes years to develop. A death count shows only the end of the story, and only for the people who did not survive it. The more important question is who is living with cancer now: who was diagnosed, at what age, and how many years they lived near these antennas first.

I am one of them.

The records exist. The New Jersey State Cancer Registry records every cancer diagnosed among Bergen County residents, with each patient's address at diagnosis. But the public state cancer map reports only areas of at least 50,000 people [103]. Wallington has about 12,000.

No public data can show whether cancer near any of these installations is unusual. The data exists. No one has looked.

I ask HHS to bring Bergen County, Wallington and the State together. The Bergen County Department of Health Services and Wallington's Board of Health, working with the New Jersey Department of Health and its cancer registry, should:

1. map every cancer diagnosed among Wallington residents, among people living with cancer today and not only deaths, against distance from each of the six installations;
2. compare those rates with expected rates for people of the same age and sex;
3. compare when each cancer was diagnosed with when each installation went up or was changed;
4. look separately at childhood cancers, especially leukemia and brain tumors;
5. protect every patient's privacy.

Are we putting our children in danger?

That is the question every parent here asks once they understand this. If these antennas raise cancer risk, the children exposed today would not show it for years. By the time it shows, it will be too late to move them. That is why the answer cannot wait for a death count. It has to come from looking now, at the people living with cancer today.

In Ripon, it took four children with cancer at one school before anyone acted [25]. Wallington should not have to count its own.

What HHS should support:

- **(a) Cancer registries.** CDC and the National Cancer Institute should help state cancer registries link confirmed cancers to the history of nearby antennas, under data-use agreements, following state cluster rules [104] and CDC's 2022 guidelines [105]. Analyses should adjust for age and sex, compare by distance and time period, allow for the years each cancer takes to appear, track where people lived, and protect privacy.
- **(b) Workers.** Measure the exposure of workers on rooftops and structures that carry antennas, as a telecommunications workers' organization has also proposed for its members [91].
- **(d) Long-term studies.** Fund the studies of children and pregnancies described in §III.
- **(f) A place to report.** Create a confidential federal system where residents and doctors can report suspected health effects from RF, with location and exposure details. Without one, what communities notice is lost.

- **(g) Clusters.** Study cancer rates in towns crowded with antennas, like Wallington, with real population counts, expected rates and where people lived, as above.
- **(h) Births.** Link state birth records to the history of nearby antennas (§III-B).

These analyses must account for other causes: traffic pollution, noise, old industry (EPA lists a former Superfund site in the borough as cleaned up [106]), jobs and income.

Each illness is treated one patient at a time. Only the registry can see the pattern, and only if someone asks it to look.

What HHS should verify:

1. How many Wallington residents are living with cancer now, and how many years had they lived near an installation before diagnosis?
2. Are cancer rates by census block within 500 and 1,500 feet of Wallington's installations higher than expected?
3. Did those rates change after the installations went up or were changed?
4. Are childhood leukemia and brain cancer rates near the Hathaway monopole and Gavlak different from the rest of Bergen County?
5. Are birth weights and early births near these installations different from the county?

IX. What research HHS should fund, and who should lead it (Q5o, Q16, Q17a–c)

Project	What it does	Lead	What it delivers
A. Antenna history registry	Records, for each site and direction, what was installed and when	HHS with FCC data	A pilot registry that includes New Jersey
B. Children at school and at home	Follows children as they grow; measures exposure at school and at home; tests thinking and memory; asks parents and teachers; measures sleep [31, 62]	NIEHS, NICHD	Results over years, not snapshots
C. Pregnancy, fertility and babies	Measures exposure at home and at work; links birth records and fertility outcomes [32, 33, 63]	NICHD, CDC	Birth weight, length of pregnancy and early-birth results
D. Measuring several sources at once	A field study across town lines in a crowded, overburdened town like Wallington [77, 82]	NIEHS with an independent laboratory	Public exposure maps by band, on every floor
E. Cancer in small areas	Combines registry data from many towns: leukemia, brain cancer, lymphoma, colorectal and other adult cancers [104, 105]	NCI, CDC, state registries	Whether cancer rates are higher than expected
F. Repeat the cancer studies	Repeats the German and Israeli residential cancer studies [10, 11] with today's antennas, measured exposure and many more communities	NCI, NIEHS	Confirms or rules out the findings at 1,150–1,300 feet

Project	What it does	Lead	What it delivers
G. Behavior and mental health	Proven measures in children and adults [64, 65]	NIEHS, NIMH	Tells symptoms apart from diagnoses
H. Repeat the DNA-damage finding	Repeats the school finding [18] in many more schools, with each child's exposure measured at school and at home, scorers who do not know who was exposed, and follow-up over time	NIEHS/NTP	Confirms or rules out the finding
I. Siting that lowers exposure (Q5o)	Measures how height, tilt, distance and direction change exposure at schools and homes	NIEHS with FCC	Health-based distances for siting
J. Fairness in siting	Asks whether protections and exposure differ by density, income and language [82]	CDC, NIEHS	A national picture
K. Losing public spaces	Compares use of parks, playgrounds and school grounds near installations with similar places farther away, along with measured exposure and how risky residents believe they are	CDC	Whether antennas cost children their parks
L. Equipment changes as natural experiments	Compares school attendance and health records, with names removed, before and after dated changes at installations near schools (for example, the water tank's December 2025 change)	NIEHS, CDC	Whether health changed when exposure changed
M. Blinded bedroom test	Fixed antennas cannot be switched off for research, but bedroom exposure can be blocked without people knowing: real and fake shielding that look the same, used for several weeks each, with sleep measured by brain-wave recording, wrist monitors and diaries, and RF measured at the pillow	NIEHS	A blinded test of nighttime exposure in real homes
N. Plain-language disclosure	A simple, multilingual template for school districts and health officers	CDC with FCC; FDA for devices	Reports people can actually use

$6.78 per resident per year pays for none of these answers. Only HHS can get them.

A plan to study exposure in the first 24 months of life is already before HHS [107]. Wallington offers the school-age next step: children whose exposure at home and at school can be tied to dated equipment at known installations, compared with Bergen County schools farther from any installation, with outcomes chosen in advance.

Who should do what (Q17):

- **(a) FDA:** medical devices and interference with them.
- **(b) NIH:** research on exposure and health, cancer, child development and how effects happen.
- **(c) CDC:** cancer and birth registries, birth-record links, environmental tracking and the reporting system.

As a public-health professional notes in this docket, HHS has coordinated research on these fields across agencies before, in the EMF RAPID program, which included state health agencies [108]. I support the advisory committee and interagency working group

proposed there. Towns should be included, because they hold the siting records. The FCC should set the data standards for the registry.

What HHS should verify:

1. Has any federal study ever followed children exposed at home and at school to several fixed antennas?
2. Which federal agency is responsible for the health of people living next to antennas today?
3. What happened to the federal study firefighters asked for in 2004?

X. Conclusion and formal invitation (Q18)

Wallington does not have one tower. It has six installations, and its people live inside them 24 hours a day.

- People see one tower. There are six installations and more than 70 panels, most hidden in plain sight. As far as any public record shows, not one protection in Wallington's own code was applied to any of them (§VI-A).
- Every resident lives within half a mile of an installation. Most live within half a mile of two or more.
- Wallington counts cancer deaths. No one has compared who is living with cancer now with where they live (§VIII).
- About 4,240 of 5,108 homes stand within 1,500 feet of one, the distance at which studies abroad found more cancer and legislators keep proposing buffers (§II-F, §V).
- An elementary school of more than 350 children sits 180 feet from a water tank that carries antennas. It was leased to a second company in 2015 and changed in 2025. The school and parents were not told.
- The federal limits date from 1996. They count half-hours, not years.
- Readings where children play, and inside neighbors' homes within 900 feet, fall inside the range where studies of schoolchildren and residents found effects [18–20].
- The World Health Organization's cancer agency, the nation's pediatricians, a federal court and the nation's firefighters have all raised concerns that no one has answered (§II).
- The tower company will not insure the risk (§II-G).
- Other places have taken antennas down. Ours are still here (§II-H).

No one has studied what this means for the children, pregnant women and families who live here.

The benefit: $6.78 per resident per year. About $41 per resident over six years.

The risk: cancer, and a worry that never goes away. No one has measured it.

I did not choose six years beside a tower. Neither did my neighbors. Neither did the children at Gavlak. Everyone who understands this now carries one more thing to worry about, every day, especially parents.

I formally ask HHS to name Wallington, New Jersey a pilot site for the multi-source exposure and health research described in §IX.

I invite HHS and NIEHS investigators to visit. I will provide the GPS coordinates, photographs and site records I have gathered, and will help coordinate with residents, the school community and local health officials. I ask HHS to contact the New Jersey Department of Health and the local health officer about Wallington.

I also ask HHS to:

- state the health basis for minimum distances between fixed antennas and schools, child care and homes, and recommend moving installations inside those distances, starting with those on public property;
- study towns crowded with antennas, and overburdened communities, as their own exposure group;
- bring Bergen County, Wallington and the New Jersey cancer registry together to find out who is living with cancer near these installations, and link cancer and birth registries to the history of nearby antennas;
- get the history of each site from the FCC;
- publish guidance on telling residents, schools and parents, in the languages they speak, about every installation, whatever it is mounted on.

A pilot here is useful whatever it finds. If exposure is low, residents finally get the reassurance no one has given them. If it is not, HHS will know where to look next.

I am available to help HHS, state health departments and other towns find hidden installations, rebuild their histories from public records, and compare how towns apply their own rules.

In 2004 the International Association of Fire Fighters, whose members sleep in their stations, asked for a federal study of firefighters living with antennas, and opposed new antennas on stations until they were shown to be safe [8]. Twenty-two years later, that study has not been done [9].

The children at Gavlak spend their school days 180 feet from an installation, and their nights within half a mile of more. No one has studied them either. And no one asked them.

Respectfully submitted,

Szymon Sikorski

Wallington, New Jersey

Which section answers which HHS question

HHS question	Section
Q2 (who I am)	Why I am writing
Q3 (personal experience)	I

HHS question	Section
Q4, Q10 (tracking health; who has cancer now)	VIII, VI-J, III-C
Q5 (research and siting)	VI, VII, IX
Q6, Q12–Q14 (what studies found; health concerns)	II, IV
Q7–Q9 (measurement and disclosure)	VII, VI-C
Q11 (people most at risk)	III, VI-I
Q13, Q15 (installations and siting)	V, VI
Q16–Q17 (research and federal roles)	IX
Q18 (anything else)	II, VI-C to VI-F, X

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70. Public comment HHS-OASH-2026-0397-2354 and photographs (Glendale, Queens, New York; Oct. 13, 2026).
71. Public comment HHS-OASH-2026-0397-0474 (middle-school teacher; Sept. 22, 2026).
72. Public comment HHS-OASH-2026-0397-0147 (Sept. 21, 2026).
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80. Borough of Wallington. Mayor and Council minutes, June 25, 2015 (request on behalf of McKay Brothers LLC to use the water tank) and July 30, 2015 (award of the water-tank lease, $27,500 per year with 3% annual increases).
81. McKay Brothers LLC. Metro Wireless Networks (company description of point-to-point wireless networks linking the Mahwah, Secaucus and Carteret data centers).
82. New Jersey Department of Environmental Protection. Overburdened Communities under the New Jersey Environmental Justice Law, Wallington Borough map (2022).
83. Borough of Wallington. Ordinance 2026-21 and Amended Main Avenue Redevelopment Plan for 460–520 Main Avenue (Burgis Associates, Aug. 4, 2026); Mayor and Council minutes, Aug. 13, 2026; Planning Board agenda, Sept. 15, 2026; Mayor and Council agenda, Sept. 17, 2026.
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85. Federal Communications Commission. Modifying a Registration in the Antenna Structure Registration (ASR) System. ASR knowledge base.
86. Borough of Wallington. Mayor and Council minutes, Oct. 9, 2018 and Jan. 19, 2023 (amended).
87. Borough of Wallington. Planning Board minutes, July 18, 2023 and Aug. 28, 2024 (special meeting).
88. Borough of Wallington. Ordinance 2026-23, bond ordinance for park improvements due to damage from Tropical Storm Ida: Notice of Pending Bond Ordinance and Summary (appropriation $1,320,000; reserve funds $655,664.50; bonds/notes $632,000); adoption notice, Oct. 8, 2026.
89. N.J.S.A. 40:55D-46.2 (P.L. 2011, c. 199), collocation of wireless communications equipment.
90. 14 C.F.R. §77.9, Construction or alteration requiring notice.

91. Public comment HHS-OASH-2026-0397-2751 and attachment, American Telecommunications Guild (Oct. 14, 2026).
92. N.J.S.A. 10:4-12(b), Open Public Meetings Act.
93. Borough of Wallington. 2026 Adopted Municipal Budget, Sheet 10, Miscellaneous Revenues: Cell Tower Rental Fees (realized in 2025, $75,442.36; anticipated for 2026, $74,268).
94. Borough of Wallington. 2025 Annual Financial Statement (certified Feb. 12, 2026), Sheet 8, General Capital Fund: Reserve for FEMA Ida – Hathaway Street Park ($600,923.95) and Reserve for FEMA Ida – Crescent Road Park.
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96. Boston Globe. Does New York City really need these giant 5G towers? (June 10, 2024); Planetizen (June 11, 2024).
97. CTIA. Wireless Industry Survey (about 51,600 cell sites, 1997); year-end 2021 count of 418,887 cell sites.
98. International Commission on Non-Ionizing Radiation Protection. Guidelines for limiting exposure to electromagnetic fields (100 kHz to 300 GHz). Health Physics. 2020;118(5):483–524.
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100. Public comment HHS-OASH-2026-0397-2308 and attachments (Oct. 13, 2026).
101. Elliott P, et al. Mobile phone base stations and early childhood cancers: case-control study. BMJ. 2010;340:c3077 (multi-site exposure model to 1,400 m).
102. Borough of Wallington. Board of Health minutes, May 15, 2024 and Feb. 19, 2025.
103. New Jersey State Cancer Registry. New Jersey Cancer Atlas.
104. New Jersey Department of Health. Cancer Cluster Response Protocol (2019).
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