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Via electronic filing

October 21, 2026

Hon. Robert F. Kennedy, Jr.
Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, DC 20201

Re: Request for Information on Electromagnetic Fields (EMFs), Radiofrequency (RF) Radiation, and Wireless Radiation Exposure, Docket No. HHS-OASH-2026-0397

Dear Secretary Kennedy:

The National Electrical Manufacturers Association (NEMA)¹ appreciates the opportunity to provide input to the Department of Health and Human Services (HHS) regarding its Request for Information (RFI) on Electromagnetic Fields (EMFs), Radiofrequency (RF) Radiation, and Wireless Radiation Exposure.² Operating at the intersection of science, commerce, and communities, NEMA works to advance human progress through electrical technologies—rooted in safety—that create a more secure and connected future for all. Our American National Standards Institute (ANSI)-accredited standards program brings together businesses, governments, and NEMA's more than 300 electrical equipment manufacturers to set standards in emerging technologies that shape the electroindustry, ensuring safety as we accelerate connectivity and innovation. From this vantage point, NEMA urges HHS to support the Federal Communications Commission's (FCC's) longstanding framework for evaluating and managing RF exposure, the continuity of which provides important public interest benefits.

Evidence in Federal Records Supports the FCC's Framework for Managing RF Exposure

For more than 30 years, the FCC has continuously evaluated and administered rules to limit human RF exposure based on the best science available and in collaboration with expert organizations like ANSI, the Institute of Electrical and Electronics Engineers (IEEE), and the National Council on Radiation Protection and Measurements (NCRP).³ Through its equipment authorization process, the FCC requires device manufacturers to routinely perform environmental evaluations to ensure compliance with exposure limits based on height and power thresholds. The FCC rules also set forth guidelines, grounded in science, for fixed infrastructure that are not subject to the FCC's exposure limits for mobile and portable devices that proceed through the FCC's equipment

¹ NEMA represents over 300 electrical equipment manufacturers that make safe, reliable, and efficient products and technologies that power, connect, and light our world. Together, our members contribute a full 1% of U.S. GDP and directly provide over 590,000 American jobs, adding more than \$375 billion to the U.S. economy. Learn more at [makeitelectric.org](https://www.makeitelectric.org).

² Request for Information (RFI): Electromagnetic Fields (EMFs), Radiofrequency (RF) Radiation, and Wireless Radiation Exposure, 91 Fed. Reg. 59792 (Sept. 21, 2026). This comment responds to Questions 5 and 7.

³ See *Targeted Changes to the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields*, Resolution of Notice of Inquiry, Second Report and Order, Notice of Proposed Rulemaking, and Memorandum Opinion and Order, 34 FCC Rcd 11689 ¶ 6 (2019) ("2019 Resolution of NOI").



authorization process. These limits derive from recommendations by expert non-governmental bodies as well as the U.S. Environmental Protection Agency (EPA), the Food and Drug Administration (FDA), and other federal health and safety agencies.⁴ The FCC continues to monitor ongoing research regarding the health effects of RF energy and ensure that these limits include built-in safety margins to reflect the gold standard consensus among global experts.⁵

As the FCC's record shows, U.S. agencies and non-government experts find "no evidence to support that adverse health effects in humans are caused by exposures at, under, or even in some cases above, the current RF limits."⁶ And indeed, no scientific evidence establishes a causal link between wireless device use and cancer or other illnesses.⁷ In contrast, commenters underscore the many benefits of the FCC's existing framework, which maintains a conservative safety margin, rooted in the best available scientific research, and also allows devices to function at necessary power levels to meet modern connectivity needs.⁸

Preserving Existing Norms Provides Significant Public Interest Benefits

Devices and infrastructure that emit RF are the building blocks of our connected world, and research continues to support the FCC's present approach.⁹ Connectivity is vital to critical infrastructure functions, public safety, health services, commerce, education, the many devices that power our everyday lives, and more. Ensuring a consistent and reliable framework for the development and deployment of these devices is paramount. Continuity of the FCC's equipment authorization process, including the RF exposure limits, promotes the continued availability and reliability of devices, which is particularly important for those that enable lifesaving functions like emergency response communications, telehealth services, geolocation, and more. Many popular consumer devices that emit RF also provide convenience and comfort, such as connected lighting products that enable consumers to turn on warm, inviting lighting before they arrive at home.

As the FCC has explained, clear and consistent communication to the public regarding RF exposure risk management is also vital to promoting public trust and security.¹⁰ In addition to providing continuity and reliability for businesses and consumers, the FCC's current approach supports a harmonized global framework, leveraging international standards based on widespread scientific

⁴ *Id.* at ¶ 11.

⁵ See *id.* at ¶ 11 n.30 (describing, e.g., ongoing research by the World Health Organization and HHS's National Toxicology Program).

⁶ *Id.* at ¶ 12 (citing *Statement from Jeffrey Shuren, M.D., J.D., director of the FDA's Center for Devices and Radiological Health on the recent National Toxicology Program draft report on radiofrequency energy exposure* (Feb. 2, 2018), <https://www.fda.gov/news-events/press-announcements/statement-jeffrey-shuren-md-jd-director-fdas-centerdevices-and-radiological-health-national>).

⁷ *Id.* (citing FCC, *Wireless Devices and Health Concerns* (Aug. 6, 2018), <https://www.fcc.gov/consumers/guides/wirelessdevices-and-health-concerns>).

⁸ See, e.g., [CTIA Reply Comments](#) at 3-4; [Mobile & Wireless Forum-Information Technology Industry Council Joint Comments](#) at 10-11; [Telecommunications Industry Association Comments](#) at 2.

⁹ See, e.g., National Council on Radiation Protection and Measurements, *Get the Facts on Non-Ionizing Radiation*, <https://non-ionizing.ncrponline.org/get-the-facts> (last visited Oct. 16, 2026) (discussing the findings of several high-quality studies that do not demonstrate adverse health effects resulting from RF exposure from cell phones and towers operating pursuant to current federal requirements).

¹⁰ See *2019 Resolution of NOI* at ¶ 11.



consensus.¹¹ This harmonization facilitates the development and delivery of world-class products at the lowest cost for consumers as devices are designed and certified for global markets.

For these reasons, NEMA encourages HHS to support the FCC's existing framework for managing RF exposure risks and its ongoing work to ensure requirements reflect widespread scientific consensus. Please contact the undersigned with any questions or for additional discussion.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex Baker". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Alex Baker
Director, Regulatory & Industry Affairs
alex.baker@nema.org

¹¹ The vast majority of countries have either adopted the FCC RF exposure limits or the International Commission on Non-Ionizing Radiation Protection (ICNIRP) standards, which are broadly similar to the FCC limits.