

**Before the
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Washington, D.C. 20201**

Request for Information on Electromagnetic	)	
Fields (EMFs), Radiofrequency (RF)	)	HHS-OASH-2026-0397
Radiation, and Wireless Radiation Exposure	)	

COMMENTS OF COMPETITIVE CARRIERS ASSOCIATION

Competitive Carriers Association (“CCA”)¹ appreciates the opportunity to submit these comments in response to the Department’s Request for Information (“RFI”) seeking input on questions related to electromagnetic fields (“EMF”) and radiofrequency (“RF”) emission and exposure² as follows:

Question 2: CCA is an industry trade association comprised of many primarily rural and regional wireline and wireless communications providers and device/equipment manufacturers and vendors that support the communications ecosystem in the United States. Many of CCA’s members provide essential services and products to consumers utilizing RF spectrum resources. Services include fixed wireless, mobile wireless, wireless backhaul, Low Earth Orbit (“LEO”) satellite, unlicensed wireless, and more. In many cases, wireless service utilizing spectrum may be the only service available to consumers in some of the most rural and remote areas of the

¹ CCA is the nation’s leading association for competitive providers and stakeholders across the United States. Members range from small, rural carriers serving fewer than 5,000 customers, to regional and nationwide providers serving millions of customers, as well as vendors and suppliers that provide products and services throughout the communications ecosystem.

² *Request for Information on Electromagnetic Fields (EMFs), Radiofrequency (RF) Radiation, and Wireless Radiation Exposure*, HHS-OASH-2026-0397-0001, 91 Fed Reg 59792 (Sept. 21, 2026) (“RFI”).

United States. Beyond fundamental consumer and business connectivity (including access to emergency services such as 911 and 988 and healthcare such as telehealth), wireless services enable innovation, economic development, and U.S. global technological leadership that fuels the United States economy and lifestyle.

Question 5: Especially since the proliferation of wireless technologies and services in the United States, the Federal Communications Commission (“FCC”) has acted as technical expert and governmental steward providing oversight of spectrum as a scarce resource and has ensured that spectrum-based services and devices do not cause harmful interference or otherwise cause unreasonable harm to consumers, the environment, and the American public. Consumer protection is a serious responsibility and high priority, and the FCC has taken its role very seriously. Pursuant to the National Environmental Policy Act of 1969 (“NEPA”), the FCC must evaluate the effect of emissions from FCC-regulated transmitters on the quality of the human environment.³ Pursuant to the Telecommunications Act of 1996, the FCC is responsible for maintaining rules on the effect of RF emissions.⁴

In 1996, the FCC established guidelines for evaluating the effects of RF radiation, including human exposure, based upon guidance from esteemed scientific organizations such as the National Council on Radiation Protection and Measurements (“NCRP”) and by the American National Standards Institute/Institute of Electrical and Electronics Engineers. Inc. (“ANSI/IEEE”).⁵ The FCC also has a history of interagency collaboration on RF safety matters,

³ National Environmental Policy Act of 1969, as amended, 42 U.S.C. §§ 4321-4335.

⁴ Telecommunications Act of 1996, as amended, 47 U.S.C. § 704(b) (requiring FCC to promulgate rules regarding environmental effects of RF emissions).

⁵ See *Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation*, Report and Order, ET Docket 93-62, 11 FCC Rcd 15123 (1996); See also *id.*, Second Memorandum Opinion and Order and Notice of Proposed Rulemaking, 12 FCC Rcd 13494 (1997) (adopting NCRP’s recommended Maximum Permissible Exposure limits for field strength and power

including collaboration with various relevant divisions of HHS including the U.S. Food and Drug Administration.⁶ The FCC has conducted periodic reviews of its RF regulations to ensure ongoing protection against harms from RF emissions.⁷ The FCC’s rules are codified in the Code of Federal Regulations (“CFR”), and are enforced against providers offering relevant services and products with RF emissions.⁸ In addition to complying with FCC rules and standards related to safe RF emissions, CCA member companies have a strong interest in ensuring the safety and satisfaction of their customer bases.

Questions 13-15: Credible and rigorous scientific research and standards support the FCC’s regulations related to the safety of spectrum emissions. Regardless of the technology referenced in the RFI and beyond (e.g., 5G, 6G, Wi-Fi, satellite, IoT, etc.) the current FCC regulations “reflect the best available information concerning safe levels of RF exposure for workers and members of the general public, including inputs from ...federal agencies charged

density for transmitters operating between 300 kHz and 100 GHz and specific absorption rate limits for devices operating within close proximity to the body as specified within ANSI/IEEE C95.1-1992). *See also* FCC, Radio Frequency Safety, <https://www.fcc.gov/general/radio-frequency-safety-0> (last visited Oct. 15, 2026).

⁶ *See, e.g.*, U.S. Food and Drug Administration, Cell Phones, <https://www.fda.gov/radiation-emitting-products/home-business-and-entertainment-products/cell-phones> (last visited Oct. 15, 2026) (discussing FDA’s role collaborating with FCC and noting that “scientific evidence has not linked cell phone radio frequency radiation with any health problems”).

⁷ *See, e.g.*, *Proposed Changes in the Commission’s Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields*, First Report and Order, Further Notice of Proposed Rulemaking, and Notice of Inquiry, ET Docket No. 03-137, 28 FCC Rcd 3498, 3503 (2013) (“FCC 2013 Review”); *Targeted Changes to the Commission’s Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields*, ET Docket No. 13-84, Report and Order, Notice of Proposed Rulemaking, and Memorandum Opinion and Order, 34 FCC Rcd 11687 (2019) (“FCC 2019 Review”).

⁸ *See* 47 C.F.R. § 1.1310 (RF human exposure limits); 47 C.F.R. § 2.1091 (RF emissions from mobile devices); 47 C.F.R. § 15 (unlicensed RF device rules); 47 C.F.R. § 18 (industrial, scientific, medical equipment limits).

with regulating safety and health and from well established international standards.”⁹ The FCC regulations are based upon very conservative scientific assumptions, which would indicate exposure at levels significantly below the current federal limits to be safe.¹⁰ Its RF regulations include “a significant ‘safety’ factor, whereby the exposure limits are set at a level on the order of 50 times below the level at which adverse biological effects have been observed in laboratory animals.”¹¹ Even with the proliferation of services and devices supported by spectrum, the existing framework’s conservative basis helps ensure high levels of safety. The FCC has taken great care and done a commendable job balancing need to protect the public from exposure to potentially harmful RF EMF emissions and the demand for the industry to provide communications services efficiently, affordably, and effectively.

Question 18: CCA and its members take EMF and RF safety very seriously. We recommend HHS continue its tradition of science-based collaboration with the FCC regarding spectrum-related safety issues. Continued coordination between HHS and the FCC would help ensure that federal policy remains grounded in rigorous scientific evidence, avoids duplicative or inconsistent regulatory approaches, and preserves the FCC’s established role in administering RF exposure requirements applicable to communications services and equipment. CCA therefore encourages the federal government to continue with the FCC leading collaboration amongst relevant health and safety agencies, with the scientific and standards-making community, and with other stakeholders in a transparent, public manner to codify RF and EMF safety requirements for communications-related devices, products, and services as it has done for the

⁹ FCC 2019 Review ¶ 2.

¹⁰ *See, e.g., id.* at ¶ 15 n. 50 (IEEE testing conservative to encompass adults and children alike); ¶ 72 (discussing conservative assumptions utilized).

¹¹ FCC 2013 Review ¶ 236.

past 30+ years. The FCC has expert staff, a well-established regulatory infrastructure, and enforcement mechanisms in place well known by communications service providers, infrastructure and device manufacturers, academia, and the general public. Further, the government's tradition of reliance on well-established, rigorous, scientific research and related standards should be upheld as the best practice. Any potential changes to federal RF exposure requirements should be supported by a rigorous assessment of the totality of reliable scientific evidence, including consideration of study quality, reproducibility, and the weight of the available evidence.

CONCLUSION

CCA appreciates the opportunity to respond to the RFI and offer input on the importance of maintaining the successful history of science-based collaboration between expert agencies, standards organizations, and other stakeholders to provide Americans the communications products and services they demand and need in today's economy in a manner that ensures health and safety.

Respectfully submitted,

/s/ Angela Simpson

Angela Simpson, General Counsel &
SVP Legal and Regulatory Affairs
Alexandra Mays, Assistant General Counsel
& Director, Regulatory Affairs
Competitive Carriers Association
601 New Jersey Avenue, NW
Suite 820
Washington, DC 20001
(202) 747-0711

October 21, 2026