

TAXPAYERS PROTECTION ALLIANCE

October 21, 2026

The Honorable Robert F. Kennedy Jr.
Secretary
Department of Health and Human Services
200 Independence Avenue S.W.
Washington, D.C. 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:

On behalf of millions of taxpayers and consumers across the country, the Taxpayers Protection Alliance (TPA) appreciates the opportunity to respond to the Department of Health and Human Services' (HHS) Request for Information regarding the potential health effects of electromagnetic fields, radiofrequency radiation, and wireless radiation exposure. As HHS reviews the state of the science, policy outcomes must carefully and properly distinguish between different types of radiation and corresponding risks for the public. Innovative technologies such as Wi-Fi—a wireless networking technology that uses radio waves to connect devices to local networks and the internet without physical cables—do not emit harmful types of radiation and pose no appreciable risk to humans. TPA urges HHS to follow the evidence and affirm the safety of wireless infrastructure.

A cornerstone of any sound risk assessment is the fundamental physical distinction between ionizing and non-ionizing radiation. Ionizing radiation—found in high-frequency regions of the electromagnetic spectrum such as X-rays, gamma rays, and ultraviolet light—carries sufficient quantum energy per photon (exceeding roughly 10 to 12 electron volts) to strip tightly bound electrons from atoms and break chemical bonds in biological tissue, directly damaging biological structures such as DNA. In stark contrast, Wi-Fi, 5G, mobile phones, and other consumer wireless devices operate at far lower frequencies (typically 2.4 GHz to 6 GHz for standard Wi-Fi) within the non-ionizing band. Photons at these radio frequencies carry energy millions of times lower than the threshold required to cause ionization. Because Wi-Fi emissions lack the physical energy to alter chemical bonds or damage cellular structure at a molecular level, conflating consumer wireless technology with high-energy ionizing hazards creates unwarranted public concern unsupported by the laws of physics.

After reviewing prior studies raising questions about wireless exposure and a decade of published research, the Food and Drug Administration (FDA) concluded in 2020 that there are no quantifiable adverse health effects in humans at or below current cell phone exposure limits.¹ In 2024, the World Health Organization (WHO) commissioned a systematic review of human studies that likewise found no association between mobile phone use and brain cancer.²

¹ U.S. Food and Drug Administration, Center for Devices and Radiological Health, Review of Published Literature between 2008 and 2018 of Relevance to Radiofrequency Radiation and Cancer (February 2024), <https://www.fda.gov/media/135043/download>

² Karipidis K, et al., “The effect of exposure to radiofrequency fields on cancer risk in the general and working population: A systematic review of human observational studies – Part 1: Most researched outcomes,” *Environment International* 191 (2024): 108983, <https://doi.org/10.1016/j.envint.2024.108983>

The below chart compares Wi-Fi to everyday sources of radiation. Cats, dogs, other humans, brick houses, granite countertops, and bananas emit low levels of ionizing radiation, while Wi-Fi emits none.

Radiation sources	Ionizing radiation?	Radiation level
 Bananas	Yes	~15 Bq per banana (radioactivity; mainly potassium-40)
 Brick houses	Yes	Trace; varies with brick composition and amount
 Granite countertops	Yes	Trace; varies with stone composition and amount
 Humans	Yes	~4,000–8,000 Bq in an adult body (approximate total activity)
 Cats	Yes	Trace; varies with body size and natural potassium
 Dogs	Yes	Trace; varies with body size and natural potassium
 Wi-Fi	No	N/A

Note: Bq (becquerel) measures radioactive decays per second, not the radiation dose a person receives. For brick, granite, cats, and dogs, there is no single meaningful universal radiation level; the amount varies. A “Yes” does not imply a dangerous exposure.

Sources: U.S. Environmental Protection Agency, U.S. Nuclear Regulatory Commission, and Centers for Disease Control and Prevention data.

Maintaining this distinction between ionizing and non-ionizing radiation sources is critical for appropriately focusing taxpayer-funded research efforts. Diverting federal resources toward warning campaigns or restrictive regulations based on unverified non-ionizing risks threatens to stall deployment of advanced broadband and wireless networks—technologies essential for bridging the digital divide. TPA urges HHS to ensure that its research priorities remain firmly anchored in evidence-based basic physical principles and enable continued innovation in wireless infrastructure.

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Sincerely,



David Williams
President