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Re: A Future Mother's Request for Stronger Protection from Radiofrequency Radiation and Environmental EMF Exposure — ET Docket No. 13-84

Dear Commissioners and Members of the Office of Engineering and Technology,

I am writing as a woman who hopes to become a mother in the near future. Having a child is one of the most important decisions I will ever make, and I want to do everything reasonably possible to protect my future baby's health and development, beginning even before conception.

I am deeply concerned about the growing presence of electromagnetic fields (EMFs) in our daily environment, particularly radiofrequency (RF) radiation emitted by cell phones, Wi-Fi routers, wireless devices, cellular antennas, and other sources of wireless communication. These technologies are now so widespread that avoiding exposure entirely seems nearly impossible. Yet the long-term health implications of continuous, everyday exposure—especially during pregnancy and early brain development—remain questions that deserve serious scientific and regulatory attention.

I am not writing to suggest that science has established that ordinary wireless exposure causes harm to every pregnancy, nor am I asking the Commission to disregard the benefits of modern communications. I am asking that the FCC take seriously the remaining scientific uncertainties and the particular concerns of women who are trying to conceive, pregnant women, infants, and developing children.

The research that has informed my concerns

I have been reading the work of the BabySafe Project, a public education initiative developed with the involvement of Dr. Devra Davis of Environmental Health Trust and Patti and Doug Wood of Grassroots Environmental Education. The project draws attention to research on prenatal wireless radiation exposure and encourages families and health professionals to consider reasonable ways to reduce exposure. Its joint statement on pregnancy and RF radiation calls for additional research, policies that limit exposure, and the development of technologies that reduce unnecessary radiation.

The BabySafe Project has also brought attention to the research of Dr. Hugh Taylor at Yale School of Medicine. In a 2012 animal study, Taylor and colleagues reported behavioral changes, including hyperactivity and memory-related effects, in mice

exposed prenatally to cell phone radiation. The researchers also reported changes involving neurons in the prefrontal cortex.

I recognize that findings in laboratory animals cannot automatically be translated into conclusions about human pregnancy. Nevertheless, research examining possible effects on the developing brain deserves careful consideration, particularly when exposure occurs during sensitive developmental periods.

I am also interested in the work of Dr. Martha Herbert, the physician and neuroscience researcher associated with Harvard whose work has explored brain development, autism, and the role of environmental influences in neurodevelopment. Her broader work has encouraged consideration of how biological vulnerability and environmental conditions may interact during development. I understand that this work does not, by itself, establish that RF exposure causes autism or other neurodevelopmental conditions. However, I believe that research into environmental influences on the developing brain should inform a comprehensive and open-minded research agenda.

The BabySafe Project's science page references additional studies that warrant careful examination, including:

- Divan and colleagues' 2008 human cohort study, which reported associations between prenatal cell phone use and behavioral outcomes in children.
- Li and colleagues' 2017 prospective cohort study examining magnetic-field exposure and miscarriage risk.
- Ren and colleagues' 2019 study of prenatal exposure to extremely low-frequency magnetic fields and fetal growth.
- Tsarna and colleagues' 2019 analysis of maternal cell phone use, pregnancy duration, and fetal growth across four birth cohorts.
- Zarei and colleagues' 2019 study examining maternal EMF exposure before and during pregnancy in relation to speech problems in offspring.
- Reviews and animal studies investigating possible effects of prenatal RF exposure on learning, memory, oxidative stress, and development.

These studies vary in design, exposure assessment, findings, and strength of evidence. Observational associations do not establish causation, and animal findings require confirmation and careful interpretation in relation to humans. I am not asking the FCC to treat every reported association as proof of harm. I am asking that the agency evaluate the evidence transparently, consider both positive and null findings, and explain clearly how the available science supports its decisions about public exposure limits.

My concern about current exposure standards

As a prospective mother, I find it difficult to know what the FCC's existing exposure limits mean for my particular circumstances. A device or transmitter may comply with a regulatory standard, but I want to understand what that compliance tells us about long-term, everyday exposure, the developing fetus, and the cumulative presence of wireless technologies in homes, workplaces, schools, and public spaces.

I understand that RF exposure limits are intended to protect public health and that the FCC has relied on scientific and technical standards in developing its rules. However, I believe that compliance with an existing standard should not eliminate the need to investigate reasonable questions about prenatal exposure, childhood vulnerability, real-world exposure patterns, and whether testing procedures reflect how people actually use wireless devices.

The FCC's current proceeding in ET Docket No. 13-84 provides an important opportunity to address questions about non-cancer health effects, children, long-term exposure, device testing, and environmental impacts. I respectfully urge the Commission to give careful attention to these issues and to make its scientific reasoning accessible to the public.

What I respectfully ask the FCC to do

I ask the Commission to consider the following actions:

1. **Reassess the scientific evidence concerning pregnancy and fetal development.** Ensure that relevant peer-reviewed human studies, animal studies, systematic reviews, and evidence of no significant effect are evaluated together, with particular attention to prenatal exposure and sensitive developmental periods.
2. **Address the protection of pregnant women and developing children explicitly.** Explain whether current exposure limits and testing procedures adequately account for the specific questions raised by fetal development, childhood vulnerability, long-term exposure, and widespread use of wireless devices.
3. **Improve real-world exposure assessment.** Evaluate whether existing device-testing procedures adequately reflect actual use, including device proximity to the body, exposure duration, changing transmission power, and the range of wireless technologies encountered in everyday life.
4. **Support independent, long-term research.** Encourage well-designed studies of prenatal and childhood exposure, with transparent methods, appropriate exposure measurements, adequate sample sizes, and independent replication. Research should distinguish RF radiation from extremely low-frequency fields and examine each exposure type using suitable methods.

5. **Adopt a precautionary approach where appropriate.** Consider practical measures that can reduce unnecessary exposure while scientific questions remain unresolved, especially for pregnant women and children. Such measures might include clearer consumer guidance, improved disclosure of device emissions and testing conditions, and the development of lower-exposure technologies.
6. **Provide clear, accessible public information.** Women should not have to navigate conflicting claims or specialized technical literature to understand what is known, what remains uncertain, and how they can make informed choices about wireless devices during pregnancy.
7. **Consider exposure-reduction options that do not place the entire burden on individuals.** Families should not be expected to solve a potentially complex environmental exposure problem solely by changing personal habits. Where technically and economically feasible, manufacturers and service providers should be encouraged to design systems and devices that reduce unnecessary emissions without compromising essential connectivity.

The practical choices available to women today

I have reviewed the exposure-reduction recommendations offered by the BabySafe Project. Some measures, such as keeping a cell phone away from the abdomen, using speakerphone or a wired headset for calls, avoiding prolonged contact between wireless devices and the body, and using wired internet connections when practical, appear relatively straightforward.

I would welcome clear, balanced guidance from the FCC on which measures meaningfully reduce exposure, how much reduction they provide under realistic conditions, and which recommendations are supported by reliable evidence. I would also appreciate guidance that distinguishes between RF radiation from wireless communications and extremely low-frequency magnetic fields from electrical wiring and appliances, since these are different forms of exposure and should not be treated as interchangeable.

I do not want fear to govern my decisions about becoming a mother. I want trustworthy information that allows me to prepare for pregnancy with confidence. I want to be able to use modern technology responsibly while understanding whether there are reasonable steps I can take to reduce avoidable exposure for myself and my future child.

A request for responsible leadership

Pregnancy is a period of extraordinary biological development, and the decisions made about public health protections today will affect families for years to come. Even where the evidence remains uncertain, the public deserves a thoughtful assessment of potential risks, meaningful investment in research, and practical guidance that reflects the best available science.

I respectfully ask the FCC to give these concerns serious consideration in ET Docket No. 13-84 and in future reviews of RF exposure policy. Please explain how the Commission has evaluated research on prenatal and childhood exposure, how it accounts for uncertainties in long-term real-world exposure, and what additional steps it believes are appropriate to protect vulnerable populations.

I also ask that the Commission consider the concerns expressed by the BabySafe Project and the researchers whose work it references, including Dr. Hugh Taylor's research on prenatal exposure and the broader developmental questions raised by Dr. Martha Herbert's work. These contributions should be assessed in the context of the full scientific literature, with due attention to methodological limitations and competing evidence.

I am one woman hoping to have a healthy baby. I know that many other women share my desire to make informed decisions about the environments in which their children will develop. We should not have to choose between participating in modern society and asking legitimate questions about environmental health.

Thank you for considering my concerns and for your responsibility to ensure that communications policy is informed by rigorous science, transparency, and the public interest. I hope the Commission will take this opportunity to strengthen the evidence base, improve public guidance, and consider reasonable ways to reduce avoidable exposure during pregnancy and early childhood.

Respectfully,

[Your Name]

A woman planning for pregnancy and concerned about maternal and child health

References and resources

1. BabySafe Project, *The Science of Wireless Radiation*:
<https://www.babysafeproject.org/science>
2. BabySafe Project, *The Joint Statement on Pregnancy and RF Radiation*:
<https://www.babysafeproject.org/joint-statement>

3. BabySafe Project, *About the BabySafe Project*:
<https://www.babysafeproject.org/about>
4. Divan HA, Kheifets L, Obel C, Olsen J. Prenatal and postnatal exposure to cell phone use and behavioral problems in children. *Epidemiology*. 2008;19(4):523–529.
5. Li DK, et al. Exposure to magnetic field non-ionizing radiation and the risk of miscarriage: a prospective cohort study. *Scientific Reports*. 2017;7:17541.
6. Ren Y, et al. Prenatal exposure to extremely low frequency magnetic field and its impact on fetal growth. *Environmental Health*. 2019;18:6.
7. Tsarna E, et al. Associations of maternal cell phone use during pregnancy, pregnancy duration and fetal growth in four birth cohorts. *American Journal of Epidemiology*. 2019;188(7):1270–1280.
8. Zarei S, et al. Mother's exposure to electromagnetic fields before and during pregnancy is associated with risk of speech problems in offspring. *Journal of Biomedical Physics and Engineering*. 2019;9(1):61–68.
9. FCC, *FCC Seeks Comment on RF Exposure Issues Subject to D.C. Circuit Remand in Environmental Health Trust v. FCC*, ET Docket No. 13-84, DA 26-997, September 2026:
<https://www.govinfo.gov/content/pkg/FR-2026-09-22/html/2026-19364.htm>

I encourage the Commission to consider these publications as part of a comprehensive evidence review rather than as conclusive proof of a specific health outcome.