01.14.26 Oversight of the FCC Hearing

1. A letter from housing organizations to Chair Hudson and Ranking Member Matsui, submitted by the minority
2. A petition from the ACLU addressed to Chairman Carr, submitted by the minority
3. An article from The Verge entitled "Brendan Carr wants to let internet providers charge hidden fees again," submitted by Rep. Barragan
4. A letter from civil rights groups to Chair Hudson and Ranking Member, Matsui, submitted by the minority
5. A letter from the International Commission on the Biological Effects of Electromagnetic Fields to Chair Guthrie, Chair Hudson, Ranking Member Pallone, and Ranking Member Matsui, submitted by the minority
6. A transcript from The Benny Show Podcast, submitted by Rep. Matsui
7. A letter from the National Call for Safe Technology to Chair Guthrie, Chair Hudson, Ranking Member Pallone, and Ranking Member Matsui, submitted by the minority
8. An article from Frontiers entitled "U.S. policy on wireless technologies and public health protection: regulatory gaps and proposed reforms," submitted by the minority
9. An article from the Associated Press entitled "How an AM radio station in California weathered the Trump administration's assault on media," submitted by the minority
10. An article titled, "Democrats Want Feds To Block Miami Latinos From Hearing Conservative Radio," submitted by Rep. Fry.
11. ICBE-EMF Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation- implications for 5G
12. EHS Letter House 2026 FCC Oversight Hearing Questions for the FCC on Cell Phone and Wireless Radiation Transparency, Safety, and Compliance

January 12, 2026

The Honorable Richard Hudson
Chairman, House Energy & Commerce
Subcommittee on Communications & Technology
2112 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Doris Matsui
Ranking Member, House Energy & Commerce
Subcommittee on Communications & Technology
2311 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Hudson and Ranking Member Matsui,

On behalf of the members of the National Multifamily Housing Council (NMHC), the National Apartment Association (NAA), and the Real Estate Technology and Transformation Center (RETTC), we write in advance of the House Energy and Commerce Committee's Federal Communications Commission (FCC) oversight hearing. We appreciate the opportunity to share how the multifamily broadband market is effectively serving America's renters and urge the Committee to support pro-housing, pro-renter policies that expand connectivity without undermining models that are already delivering results.

Connectivity Is a Core Resident Priority

Reliable, high-quality internet access is essential to residents' daily lives and is a critical amenity in today's rental housing market. Housing providers therefore prioritize investments in connectivity and increasingly rely on tools such as bulk billing and managed Wi-Fi to improve service reliability, reduce costs, and enhance the resident experience. These solutions ensure residents have immediate access to internet service upon move-in—an expectation clearly reflected in the 2024 NMHC/Grace Hill Renter Preferences Survey, in which 87 percent of more than 172,000 respondents rated immediate internet availability as "very important" or "absolutely essential."

Through negotiated agreements with internet service providers (ISPs), housing providers can tailor connectivity solutions to the specific needs of their communities, including dedicated bandwidth and service-level agreements that ensure performance, reliability, and responsive customer support. This partnership-based model enables seamless, affordable connectivity that meets modern resident expectations.

The Existing Federal Framework Is Working

We commend FCC leadership for fostering innovation and reducing unnecessary regulatory burdens while maintaining access to cutting-edge broadband services in rental housing communities. The current federal regulatory framework governing partnerships between housing providers and communications providers has proven effective in promoting broadband deployment, affordability, and adoption. The FCC has repeatedly reviewed and affirmed the health of the multifamily broadband market, including its analysis of bulk billing arrangements.

Bulk internet agreements deliver broadband service to entire rental communities at a lower per-unit cost than individual subscriptions, expanding access—particularly for low-income, senior, student, and veteran households. By eliminating credit checks, deposits, and equipment rental fees, and often allowing service upgrades, bulk billing reduces barriers to adoption and delivers meaningful cost savings for renters. At the same time, predictable revenue streams enable ISPs—especially smaller and independent providers—to justify the significant upfront investment required to deploy modern broadband infrastructure, including in affordable housing where traditional retail models often fall short. Most recently, in 2024, the FCC reaffirmed the positive role bulk billing can play in serving renters with high-quality broadband.

As the Committee considers solutions to the nation's broader digital divide, it should look to proven, scalable models already succeeding in the rental housing market.

State and Local Policies Risk Undermining Progress

Despite the success of the federal framework, some state and local policymakers have advanced legislation that could inadvertently undermine broadband access and affordability. A recent example is California's AB 1414, which runs counter to FCC findings and weakens the economic model that supports broadband investment and adoption in rental housing communities.

Such policies risk deterring infrastructure investment and reducing broadband access, affordability, and service quality. The Committee and the FCC should encourage state and local leaders to build on—not disrupt—the proven success of the multifamily broadband market by leveraging tools like bulk billing and managed Wi-Fi to expand connectivity.

Conclusion

As the Committee evaluates the FCC's role in advancing connectivity, we urge policymakers to recognize the critical role rental housing providers play in serving consumers and to avoid policies that raise costs or slow broadband expansion. Specifically, NMHC, NAA, and RETTC encourage policymakers to:

- Support policies that preserve the existing broadband partnership model, allowing housing providers and communications providers to negotiate agreements under free-market conditions that promote competition, high service standards, and reliable, high-speed internet.
- Engage housing stakeholders when shaping broadband and infrastructure policy to ensure solutions reflect the realities of the rental housing landscape.
- Encourage state and local leaders to embrace the demonstrated success of multifamily broadband solutions, including bulk billing and managed Wi-Fi, that remove barriers to access, improve affordability, and spur competition.

NMHC, NAA, and RETTC and our members stand ready to work with the Committee and the FCC to advance thoughtful, pro-housing, pro-renter policies that expand connectivity without undermining successful models already delivering results.

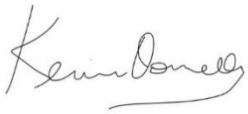
Sincerely,



Sharon Wilson Géno
President
National Multifamily Housing Council



Bob Pinnegar
President and Chief Executive Officer
National Apartment Association



Kevin Donnelly
Executive Director and Chief Advocacy Officer
Real Estate Technology & Transformation Center

Dear Chairman Carr,

We, the people must never accept government threats to our freedom of speech. Efforts by leaders to pressure artists, journalists, and companies with retaliation for their speech strike at the heart of what it means to live in a free country.

A few months ago, Jimmy Kimmel was taken off the air after the government threatened a private company with retaliation, marking a dark moment for freedom of speech in our nation. In an attempt to silence its critics, our government has resorted to threatening the livelihoods of journalists, talk show hosts, artists, creatives, and entertainers across the board. This runs counter to the values our nation was built upon, and our Constitution guarantees.

We know this moment is bigger than us and our industry. Teachers, government employees, law firms, researchers, universities, students, and so many more are also facing direct attacks on their freedom of expression.

Regardless of our political affiliation or whether we engage in politics or not, we all love our country. We also share the belief that our voices should never be silenced by those in power – because if it happens to one of us, it happens to all of us.

This is the moment to defend free speech across our nation. We encourage all Americans to join us, along with the ACLU, in the fight to defend and preserve our constitutionally protected rights.

In solidarity,

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Cynthia Simonds
Renee Twomey
Anne (Unknown)

Lauren Martinez
Lori Shein
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Debra Spotts
Scott Clemmons
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Linda Bischoff

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Tracye Tallent

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Valerie Konczal

Caleb Fretz

Adrienne Gallagher

Seven Lyons

Barbara Nemeth

Ruby Gilpin

Marilyn Nichols

Elaine Masterton

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Elizabeth Carbone
Bart Cohen
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Betsy Hall
Addy Norenberg
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Amber Plaut Dorio
Dalton Sutherland
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Maggie Ramsay
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Mrs Sharon L Hone
Karen Armstrong
Carrie Mcrae
Loa Gerberich
Karine Jacquin
Linda Thompsonpoeder
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Brieannon Akins
Jon Cauble
Joan Marie Florence
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Paula Hall
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Cary Harrison
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Wendy Walker
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Gale Rullmann
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Katelyn Grove
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Dawson Chase
Dagne Sollid
Ian Brumberger
Tom Wagner
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Mia Swanton
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Sarah---- Lively
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Kumbukage Seneviratne
Ashley Tomita
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Leigh Hilbert
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Terri Lynch
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Margaret Detar-Lavallee
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John Warren
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Judith Levine
Katherine Davis
Tracie Morrison
Rita Wright
Leopoldo Mutis
Calen Collopy
Claudia Gutierrez
William Palmer
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Regina Salice
Anthony Moore
Elizabeth Stone
Michelle Jones
Miranda Compton
Mark White
Ralph Knapp
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Christine Ward
Mary Small
Quinn Powell
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Karen Bowman
Nancy Hull
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Matthew Lujan
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Bunnie Rogers (They/Them))
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G Lynn Huber
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Molly Howard's

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Lydia Harris

Cadence Boucher

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Mihai Capotă
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Aclu Supporter French
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Lynne Weiske
Signe Stuart
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Carter Gethin

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Josephus Battlesword

Kristin Tita

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Asha White

Erica Brooks

Phil Johnson

Kirk Melhuish

Jamie Hyatt

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Cassidy Oberst

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NEWS POLICY TECH

Brendan Carr wants to let internet providers charge hidden fees again / Providers have argued that requirements to itemize every fee they charge are burdensome.

by Jess Weatherbed
Oct 10, 2025, 9:14 AM EDT

43 Comments (All New)

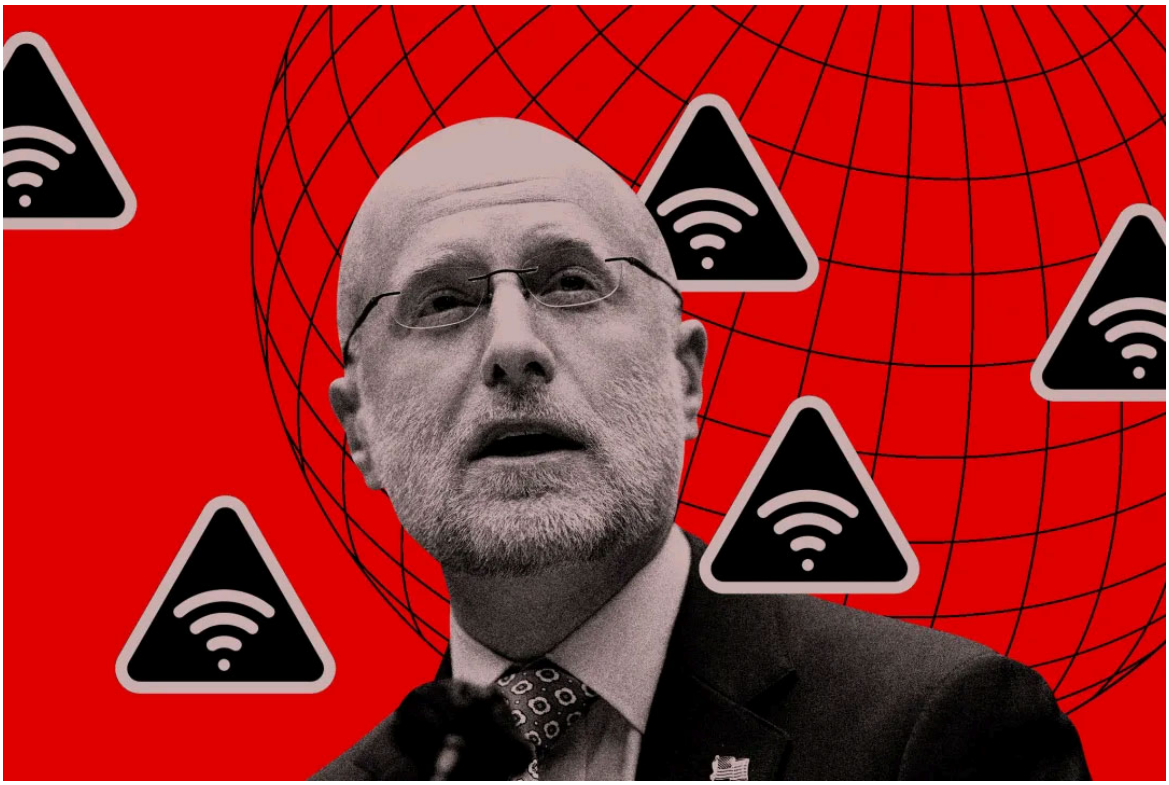


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Jess Weatherbed is a news writer focused on creative industries, computing, and internet culture. Jess started her career at TechRadar, covering news and hardware reviews.

Broadband customers may find themselves blighted by unexpected charges again, thanks to Federal Communications Commission chairman Brendan Carr. The FCC has submitted a proposal to revise "unnecessary" requirements for internet service providers to itemize every fee on monthly bills, citing that it "may confuse customers."

The proposal comes in response to complaints by ISPs over a Biden-era transparency rule that took effect in April 2024, arguing that their self-inflicted billing complexity made it impractical and burdensome to list every fee they impose on consumers. Compliance with the rule requires that ISPs either create a broadband "nutrition label" that makes it easier for consumers to accurately

compare plan prices and avoid hidden fees, or include those hidden charges in the overall price.

The FCC isn't seeking to ditch itemized labels entirely, it's specifically targeting requirements for making labels inclusive of location-based fees, machine-readable, multi-lingual, and available to customers over the phone and on online account portals. However, the proposal is also examining ways to further streamline or eliminate "any other label requirements that are unduly burdensome and provide minimal benefit to con umers," which could further impact how labels are presented when shopping for new broadband plans.

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In a blog post heralding the proposal on Monday, Carr said that broadband labels are being examined to "focus on consumer protection," and to "separate the wheat from the chaff." A vote on the changes has been scheduled for October 28th, and requires FCC approval before it can take effect.

The proposal falls under the "Delete, Delete, Delete" initiative Carr launched in March that aims appease President Donald Trump's order to remove as many government regulations as possible. As noted by *Ars Technica*, the Internet and Television Association (NCTA) lobby group specifically appealed to the FCC under this initiative to have fee itemization rules scrapped, after similar requirements were first imposed on cable and satellite TV providers in March.

43 COMMENTS

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January 14, 2026

The Honorable Richard Hudson
Chairman
Subcommittee on Communications and Technology
U.S. Senate
Washington, DC 20515

The Honorable Doris Matsui
Ranking Member
Subcommittee on Communications and Technology
U.S. Senate
Washington, DC 20515

Dear Chairman Hudson and Ranking Member Matsui,

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 240 national organizations to promote and protect the rights of all persons in the United States, and the undersigned organizations, we express our deep concern with the operations of the Federal Communications Commission and urge the Committee to conduct vigorous oversight.

We also ask for this letter to be entered into the record of the January 14, 2026, House Subcommittee on Communications and Technology hearing conducting oversight of the Federal Communications Commission.

Federal Communications Commissioner (FCC) Chair Brendan Carr has weaponized the Commission to fight a culture war for the administration instead of carrying out the Commission's true mission: to serve the people of the United States. As a chief author of the anti-democratic Project 2025, Chair Carr is committed to a vision of a nation that serves the interests of the powerful few. As civil rights advocates, we are deeply alarmed by his attacks on our values and our communities and urge this committee to take seriously its charge to conduct oversight of the FCC.

Censoring the Press and Dissenting Voices: FCC Chair Brendan Carr's pressured American Broadcasting Company (ABC) affiliates to not carry Jimmy Kimmel Live. The FCC has significant influence over the broadcasting licenses of the affiliates, influence that should not be abused to silence dissenting voices for political gain.[1] First amendment experts pointed to Carr's rhetoric and the subsequent (temporary) removal of Kimmel's show as a

[1] Press Release, ACLU, ACLU Responds to Trump Administration Move Censoring Jimmy Kimmel (Sept. 17, 2025), https://www.aclu.org/press-releases/aclu-responds-to-trump-administration-move-censoring-jimmy-kimmel.

textbook example of an undue and violative form of pressure,[2] and highlighted the many ways in which the FCC has attempted to police speech (both in the issuance of broadcast licenses and the approval of mergers).[3] Carr did not learn his lesson to avoid pressuring broadcasters, and shared President Trump's post asking for Seth Myers to be fired on his own X account.[4]

Gutting Media Diversity Rules: The FCC's media ownership rules play an important role in preventing individual companies from dominating national or local markets and fulfilling the FCC's obligation to promote media diversity. Eliminating the media ownership rules abdicates the FCC's statutory obligation, continuing to exclude people of color from broadcast ownership.[5] Further, relaxing media ownership limits will exacerbate already-low competition, localism, and viewpoint diversity while also harming workers. Several pending mergers, including Nexstar's $6.2 billion deal to take over TEGNA would blast through existing ownership rules.[6] We urge the Committee to ensure that the Commission will follow regular process and consider this transaction, and the media ownership rules, with a vote of the FCC Commissioners.

Coercing Companies to Pull Back on Diversity and Equity: We also have serious concerns about the ways in which FCC leadership has weaponized the Commission's merger authority to pressure media and telecommunications companies into abandoning their diversity, equity, and inclusion (DEI) programs.[7] Earlier this year, Chair Carr publicly stated he does not see "a path forward" to approve transactions for companies that maintain DEI programs, encouraging businesses seeking FCC merger approval to "get busy ending" their diversity initiatives.[8] FCC Commissioner Anna Gomez has condemned this as government overreach that stifles free expression, noting that "there is a freedom of speech component to diversity, equity, and inclusion" and stating that this approach represents "control of a private company's employment practices" that "has nothing to do with what we do at the FCC."[9] Despite plain civil rights mandates and an abject failure to meet them, the FCC has threatened or coerced many companies to eliminate their programs that aimed to ensure fair treatment of and equal opportunity for women, people

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[2] Anna Branigin, "How Cancel Culture Came for Everyone," Washington Post (Oct. 1, 2025), https://www.washingtonpost.com/style/power/2025/10/01/cancel-culture-kimmel/.
[3] Ted Johnson, "Brendan Carr's Threats On Networks May Be "Jawboning," And Courts Don't Like It, Legal Experts Say" Deadline (Sept. 19, 2025), https://deadline.com/2025/09/fcc-brendan-carr-jawboning-jimmy-kimmel-1236549243/; Tom Wheeler, "Trump's CBS Lawsuit Ties Media Freedom to FCC's Regulatory Power," Brookings (Feb. 19, 2025), https://www.brookings.edu/articles/trumps-cbs-lawsuit-ties-media-freedom-to-fccs-regulatory-power/.
[4] Brendan Morrow, Trump calls for NBC to fire Seth Meyers, FCC Chair Brendan Carr weighs in. USA TODAY (Nov. 17, 2025), https://www.usatoday.com/story/entertainment/tv/2025/11/17/trump-seth-meyers-fcc-chair-brendan-carr/87315926007/#.
[5] George Winslow, "Unions, Civil Rights Groups Argue Localism Will Be Hurt, Not Helped by Eliminating Ownership Caps," TV Tech (Aug. 28, 2025), https://www.tvtechnology.com/news/unions-civil-rights-groups-argue-localism-will-be-hurt-not-helped-by-eliminating-ownership-caps.
[6] Keith Collins and Raj Saha, "How a TV Merger Raised the Pressure on ABC to Suspend Kimmel," New York Times (Sept. 19, 2025), https://www.nytimes.com/interactive/2025/09/19/business/media/abc-nexstar-kimmel.html.
[7] Commissioner Anna Gomez, Remarks at US Hispanic Chamber of Commerce Summit, (March 25, 2025), https://www.fcc.gov/document/commissioner-gomezs-remarks-us-hispanic-chamber-commerce-summit.
[8] Cameron Coats, Carr: Broadcasters With DEI Programs Could Get Deals Blocked, Radio Ink, (March 24, 2025), https://radioink.com/2025/03/24/carr-broadcasters-with-dei-programs-could-get-deals-blocked/.
[9] Cameron Coats, Gomez: DEI Attacks Part of 'Censorship and Control' Under Trump, Radio Ink (April 8, 2025), https://radioink.com/2025/04/08/gomez-dei-attacks-part-of-censorship-and-control-under-trump/.

of color, people with disabilities, and the LGBTQ community in order for their mergers to be approved.[10] The Leadership Conference made clear earlier this year that our nation's civil rights laws remain in place and the Chairman's efforts to circumvent them is an affront to the nation's commitment to fairness.[11]

Increasing costs and endangering communities by increasing phone and video prices: The Commission recently adopted higher prices for consumers which will likely lead to increased recidivism for incarcerated people. The Senate unanimously adopted the Martha Wright Reed Act in 2022 to lower rates and the Commission implemented that law in 2024. When the FCC proposed the changes in October, members of this committee denounced Chair Carr's rolling back the implementation of the Martha Wright Act.[12] The law passed out of Congress on a bipartisan basis, and the FCC's 2024 Final Rule (2024 Rule) was adopted on a 5-0 vote. Recent analysis of the FCC's changes found that they would lead to a 66 percent drop in call minutes, and the rates people would pay will increase by as much as 83 percent - costing consumers hundreds of millions of dollars annually.[13] We urge Chair Carr to roll back the changes made and enforce the 2024 Rule as originally adopted by the Commission.

Aiding Ban on State and Local AI Laws: Chair Carr previously stated that he would be taking a look at how "the FCC may be able to play a role in helping" block state laws regulating artificial intelligence,[14] and the FCC has followed up the Chair's comments by issuing two notices seeking to ban enforcement of state laws regulating AI.[15] While the Chair may be eager to assist the White House in these efforts, the Communications Act does not grant the FCC authority over artificial intelligence, and it does not have the power to preempt state AI law.[16] Further, public polling has made clear that the public wants more regulation of AI, not less.[17]

We stand ready to work with Congress on policies that will protect civil rights, prevent unlawful discrimination, and advance equal opportunity. Should you require further information or have any

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[10] Inside Radio, Commissioner Urges Private Companies to Fight FCC Efforts to End DEI, (March 26, 2025), https://www.insideradio.com/free/commissioner-urges-private-companies-to-fight-fcc-efforts-to-end-dei/article_4be2f10e-9b92-46b7-9b0f-e70f019c54ed.html.

[11] Open Letter from the Leadership Conference on Civil and Human Rights to Leaders in Business, Philanthropy, Education, Law, Non-Profits, and Health Care (May 16, 2025), https://civilrights.org/resource/your-civil-rights-obligations-remain-in-force/.

[12] Press Release, Senator Tammy Duckworth, Duckworth Leads Colleagues in Denouncing FCC Chai Brendan Carr's Unlawful Plan to Increase Costs for Law Abiding Americans with Incarcerated Loved Ones (Oct. 28, 2025), https://www.duckworth.senate.gov/news/press-releases/duckworth-leads-colleagues-in-denouncing-fcc-chair-brendan-carrs-unlawful-plan-to-increase-costs-for-law-abiding-americans-with-incarcerated-loved-ones.

[13] Press Release, Worth Rises, Worth Rises Releases Impact Analysis of the FCC's Proposed Revisions to Its 2024 Regulations on Incarcerated People's Communications Services and Rebukes the Revisions as Overly Broad and Misguided (Oct. 15, 2025), https://worthrises.org/pressreleases/2025/10/15/worth-rises-releases-impact-analysis-of-the-fccs-proposed-revisions.

[14] Chris Teale, "FCC Chair Floats Preempting State AI Laws," Route Fifty (Sept 30, 2025), https://www.route-fifty.com/artificial-intelligence/2025/09/fcc-chair-floats-preempting-state-ai-laws/408472/.

[15] Austin Bonner and Alex Tate, "FCC Kicks Off AI Action Plan Efforts," HWG (Oct. 1, 2025), https://hwglaw.com/2025/10/01/fcc-kicks-off-ai-action-plan/.

[16] Harold Feld, "Can the FCC Preempt State Laws on AI? No - Especially Not With Broadband As Title I," Public Knowledge (Sept. 19, 2025), https://publicknowledge.org/can-the-fcc-preempt-state-laws-on-ai-no/.

[17] Benedict Vigers and Justin Lall, "Americans Prioritize AI Safety and Data Security," Gallup (Sept. 16, 2025), https://news.gallup.com/poll/694685/americans-prioritize-safety-data-security.aspx.

questions regarding this issue, please feel free to contact Jonathan Walter, senior policy counsel, at walter@civilrights.org.

Sincerely,

The Leadership Conference on Civil and Human Rights
Lawyers' Committee for Civil Rights Under Law
UnidosUS
United Church of Christ Media Justice Ministry
Asian Americans Advancing Justice – AAJC
Common Cause
Communications Workers of America
Hispanic Federation
League of United Latin American Citizens (LULAC)
National Action Network
National Association of Broadcast Employees and Technicians (NABET-CWA)
National Council of Negro Women (NCNW)
National Consumer Law Center, on behalf of its low-income clients
National Hispanic Media Coalition
National Urban League

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Ukraine

To: Hon. Brett Guthrie, Chair
House Committee on Energy & Commerce

Hon. Frank Pallone, Ranking Member
House Committee on Energy & Commerce

Hon. Richard Hudson, Chair
House Subcommittee on Communications & Technology

Hon. Doris Matsui, Ranking Member
House Subcommittee on Communications & Technology

Members of the House Committee on Energy and Commerce
U.S. House of Representatives
2113 Rayburn House Office Building
Washington, DC 20515

January 12, 2026

Re: Oversight Hearing of the Federal Communications Commission on January 14, 2026

Dear Chairman Brett Guthrie and Ranking Member Frank Pallone Jr., Chairman Hudson, Ranking Member Matsui, and Members of the Committee,

We write to you as experts of the International Commission on the Biological Effects of Electromagnetic Fields (ICBE-EMF), an international consortium of scientists, doctors, and researchers with extensive expertise and peer-reviewed publications on the biological and health effects of non-ionizing electromagnetic fields, including the radiofrequency (RF) radiation emitted by cell towers and 4G/5G infrastructure.

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We have just submitted our scientific comments to the FCC opposing its "Build America: Eliminating Barriers to Wireless Deployments" NPRM due to the serious public health and environmental implications, its disregard for established scientific research, and its erosion of democratic, community-based decision-making. In our filing, we told the FCC that cell towers, 5G, and wireless infrastructure should not be fast-tracked as this will increase public exposure to RF radiation, an environmental exposure that peer-reviewed scientific research has associated with numerous health and environmental harms. U.S. limits on allowable exposures to RF radiation, unchanged since 1996, are not science-based and do not protect the public.

We write you to request that you ask the FCC several questions regarding the FCC's activities related to cell tower and wireless safety.

As documented by ICBE-EMF, in our paper published in *Environmental Health* entitled "Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation: implications for 5G," FCC's RF radiation exposure guidelines ignore decades of peer-reviewed research showing biological harm at levels far below those that cause heating.[1] The FCC's outdated 1996 limits are based on scientifically unsupported assumptions, focusing only on short-term heating effects while ignoring the extensive peer-reviewed published scientific evidence of biological harm at lower, non-heating levels. The FCC's 1996 limits were derived almost entirely from short-term behavioral disruption studies in animals, such as heat-induced changes in behavior and the limits do not account for chronic exposure or the pulse-modulated signals transmitted by wireless technologies. Further, despite a federal court order[2,3] to explain how its limits are adequately protective, FCC limits have not been updated based upon a comprehensive review of the current scientific evidence on cellular, neurological, reproductive, or carcinogenic effects. Thus, they do not account for long-term health effects, children's vulnerability, electromagnetic hypersensitivity, cumulative exposures, or the documented impacts on wildlife and ecosystems.

A rapidly expanding body of peer-reviewed research demonstrates that RF radiation from wireless infrastructure, including cellular towers and 5G small cell towers, can produce harmful effects at levels far below current FCC limits.[4,5,6,7,8,9,10,11]

Large-scale animal research, including the U.S. National Toxicology Program (NTP) and Ramazzini Institute studies, both found increased brain and heart tumors.[12,13] Notably, the Ramazzini Institute (RI) used much lower RF radiation levels as compared to the NTP, with RF levels that were lower than the FCC limit for cell tower emissions. Further, the same types of tumors reported in the NTP and RI studies have also been observed in human studies,[14,15] adding significant confidence that the associations observed in human studies are real.[16,17] Studies of people living near cell towers show increased biomarkers of DNA damage, oxidative stress, hormonal disruption, sleep disturbance, neurological symptoms, and increased cancer rates.[18,19,20]

The American Academy of Pediatrics has repeatedly urged[21] the FCC to update its outdated wireless radiation regulations to account for children's increased vulnerability, noting that the research shows children absorb higher rates of RF radiation deeper into their more sensitive brains, as compared to adults.[22,23] Further, research has also documented that cell phone radiation exposure can exceed limits when the phone is close to the body, [24,25] and that Wi-Fi and cell towers can increase children's exposure in schools. [26,27]

Further, the FCC plan puts wildlife at risk. The FCC has not established guidelines to protect non-human species from RF radiation even though there is a large and growing body of evidence that demonstrates the biological effects of RF radiation on animals and plants.[28,29,30,31,32]

We caution that the FCC's proposed changes will come at a serious cost to public health and the environment, as well as strip state and local government authority.

In 2021, the D.C. Circuit Court of Appeals issued a remand order on the FCC RF radiation emission limits, requiring it to provide a reasoned explanation for not updating its RF radiation emission limits, which were last set in 1996, when only a fraction of the cell towers and cell phones that we have today existed. The order stated that the FCC had failed to respond to "record evidence that exposure to RF radiation at levels below the Commission's current limits may cause negative health effects unrelated to cancer." The Court ordered the FCC to examine the effects of long-term exposure to humans and the environment, particularly to children. To date, the FCC has not complied.

The FCC's reliance on Section 704 of the Telecommunications Act to preempt local consideration of environmental and health impacts is unjustified because the Commission has not conducted any meaningful review of RF radiation effects, nor ensured that any federal agency is doing so. Without updated safety limits or an up-to-date current scientific evaluation, how can the FCC continue to claim that health and environmental impacts may not be considered by local governments when considering where to place a cell tower? The Commission has failed to perform the very scientific and environmental oversight that Congress presumed when enacting Section 704, and it cannot lawfully claim that state and local governments are barred from considering impacts the FCC itself has never reviewed.

There is not a consensus for wireless safety. The International EMF Scientist Appeal, a petition submitted to the United Nations and signed by more than 260 scientists who have published over 2,000 papers on EMF, biology, and health, states that the current wireless RF radiation human exposure guidelines set by the FCC and other national and international organizations are based on avoiding heating effects and do not adequately protect against known health risks that do not involve heat that can cause long-term health risks.[3334] The science is far from settled, and numerous medical organizations and public health experts recommend reducing exposure as substantial evidence exists pointing to serious risks.[35]

The FCC's proposal effectively treats American communities as test subjects in an uncontrolled national radiation experiment, one conducted without consent, without monitoring, and without updated safety limits. If the Commission proceeds to fast-track cell towers without revising its outdated 1996 RF radiation exposure limits, it will knowingly promote densification of industrial wireless transmitters and expose millions to cell tower RF radiation levels that multiple peer-reviewed studies associate with increased cancer risk, neurological reproductive harm.

Given the FCC's continued reliance on outdated 1996 cell tower and wireless RF radiation exposure limits and the agency's lack of proper substantive scientific review in the nearly three decades since, we respectfully request clear and direct answers to the following oversight questions.

1. FCC RF exposure limits were set in 1996. What specific scientific review since then has the FCC conducted that justifies treating

those limits as protective for today's chronic cell tower radiation exposures?

2. What evidence does the FCC rely upon to conclude its limits adequately protect children, especially for long-term exposure?
3. In 2021, the D.C Circuit ordered the FCC to provide a reasoned explanation for not updating its wireless RF limits and to address scientific evidence of harm below FCC RF limits, including impacts on children and the environment. What has the FCC done since that remand, and why has it still not updated the limits? Provide the timeline and deliverables regarding the FCC's response to the court.
4. The FCC relies on Section 704 of the Telecom Act to preempt local consideration of health/environmental effects, yet the FCC has not shown it has conducted any meaningful review of the health effects of RF radiation. On what basis can the FCC bar local consideration of impacts the FCC itself has not fully analyzed?
5. In a February 6, 2019, Senate Commerce, Science, and Transportation Committee hearing on 5G, when industry executives were asked what safety testing has been performed on 5G, wireless industry representatives were asked whether they have supported research on the safety of 5G technology and the industry representatives conceded they have not.[36] Then Senator Blumenthal stated, "we're kind of flying blind here" with respect to the health and safety of 5G.[37] What has the FCC, FDA and federal agencies done during the past 7 years to assure the American public that 5G and new technologies are safe?
6. What safety testing has been done on 5G and new and emerging technologies to ensure protection for long-term exposures?
7. In light of the increased daily wireless RF radiation exposure to the population, why isn't the FCC recommending policies to monitor and reduce public exposure to RF radiation as many other countries already have done?
8. What incentives does the FCC provide to support R and D for safer technology[38] with lower RF emissions?

The public cannot be assured of safety, and Congress cannot exercise its oversight function, without a clear accounting of the scientific basis for continued reliance on decades-old limits that predate modern wireless technologies, chronic exposures, and the ubiquity of RF sources in daily

life. We welcome continued dialogue that could lead to more health protective solutions.

Our experts stand ready to meet with you and provide any additional information or clarification needed to support the fulfillment of the Committee's oversight responsibilities.

Respectfully submitted,

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The Benny Show Podcast September 17, 2025

Benny Johnson (Johnson): Ladies and gentlemen, here to speak authoritatively on this issue is the chairman of the FCC, Brendan Carr, joining us live now. Mr. Chairman, thank you so much for being on our program. This is something that obviously is concerned, a great many number of people, about Jimmy Kimmel's monologue. What does the FCC's stance on this? Certainly is a heightened moment in American history where you do not want to see copycats, you do not want to see further radicalization, but by slandering and maligning and distorting what happened to Charlie Kirk, Jimmy Kimmel seems to be inviting it.

Chairman Brendan Carr (Carr): First of all, Benny, I don't think you and I haven't had a chance to talk yet since Charlie Kirk's death and I think I just want to join everything you've been saying about Charlie, his life, an amazing man. I think what was so revealing in the last few days is, I think what dawned on so many people is that everyone I think knew that Charlie Kirk had said something kind to them, had lifted them up when they were either a low point in their career or at no point in their career. And when you saw so many people conveying their stories with Charlie, you saw a sort of a connection across hundreds and thousands of people that you knew he meant something to you, but you didn't know that he had somehow found the capacity to be that sort of meaningful inspiration for so many people. I think that's why there's sort of a dawning on people and a reflection in the last couple of days that's been so meaningful to see. You know, when you look at the conduct that has taken place by Jimmy Kimmel, it appears to be some of the sickest conduct possible. As you've indicated, there are, you know, avenues here for the FCC, so there are some ways in which I need to be a little bit careful, because we could be called ultimately to be a judge on some of these claims that come up, but I don't think this is an isolated incident. I mean, you go back to Representative Swalwell, and he had a tweet out last week where he was saying that, you know, emphasizing that Charlie Kirk's killer was a straight white male from a Republican family that voted for Trump. In some quarters, there's a very concerted effort to try to lie to the American people about the nature, as you indicated, one of the most significant newsworthy public interest acts that we've seen in a long time. And what appears to be an action, appears to be an action, by Jimmy Kimmel to play into that narrative that this was somehow a MAGA or Republican motivated person. If that's what happened here with his conduct, that is really, really sick. And I've been very clear from the moment that I have become chairman of the FCC, I want to reinvigorate the public interest. And what people don't understand is that the broadcasters, and you've gotten this right, are entirely different than people that use other forms of communication. They have a license

granted by us at the FCC, and if that comes with it, an obligation to operate in the public interest. And we can get into some ways that we've been trying to reinvigorate the public interest and some changes that we've seen. But frankly, when you see stuff like this, I mean, look, we can do this the easy way or the hard way. These companies can find ways to change conduct, to take action, frankly, on Kimmel, or, you know, there's going to be additional work for the FCC ahead.

Johnson: What kind of action would you see? At the very least, I would like to have an on air apology from Jimmy Kimmel to the Kirk family, to all of those who he slandered because he did say that Charlie Kirk, he is effectively saying that our movement did this, our movement killed Charlie, that Charlie was deserving of this effectively. And we've seen that rear its head. This happens quite regularly, actually, on MSNBC and on other networks, where they're trying to victim blame. And what that does, Mr. Chairman, respectfully, is continues the lie and continues the threat level to say effectively that we have no share in this problem at all on the left. This is a clear-cut case. What would you like to see done at ABC?

Carr: Well, look, I think what you said there strikes me as a very reasonable minimal step that can be taken. I mean, obviously, look, there's calls for Kim will be fired. I think, you know, you could certainly see a path forward for suspension over this. And again, you know, the FCC is gonna have remedies that we could look at. And again, you know, we may ultimately be called to be a judge on that. But this also strikes me as sort of conduct that to some extent shows some sort of desperate irrelevance. I mean, we're sort of exiting an era where the three main broadcast legacy broadcast networks could control and dictate the narrative to the American people. And one of the things that President Trump did when he ran for office, he ran directly at that legacy media establishment. He smashed the façade that they get to control what we say, what we think, the narrative around events. And we're seeing a lot of consequences that are flowing from President Trump doing that. I mean, look, NPR has been defunded, PBS has been defunded, Colbert is retiring, Joy Reid is out at MSNBC, Terry Moran has gone from ABC and is now admitting that they are biased. CBS has now made some commitments to us that they're going to return to more fact-based journalism. And so I think you see some lashing out from people like Kimmel who are, frankly, talentless and are looking for ways to get attention. But, you know, their grip on the narrative is slipping. That doesn't mean that it's still not, you know, important to hold in the public interest standard. That's what we're going to have to do.

Johnson: So we did elucidate and enumerate a number of statutes that could be used against ABC. If you would, Mr. Chairman, would you just explain for us what broadcasting in

the public interest means? I don't think most people understand actually the depth of how important it is that ABC, NBC, CBS have these gratuitous broadcast privileges granted to them by the American taxpayer.

Carr: Yeah, the right way to sort of explain this to people so they understand it is in the media landscape as relevant here, there's two main buckets of actors. One, you've got what we call national programmers. That's what Comcast is, Comcast NBC, that's what Disney is, Disney ABC. They're the ones that effectively create and produce these shows. They then provide those shows to individually licensed TV stations. Those TV stations are in the main owned by independent companies, independent from Comcast and Disney. But Disney and Comcast both own some televisions themselves. So start from the idea that you have national programmers that create the show, including The Kimmel Show, and then they're given to and distributed over licensed TV stations. It's the licensed TV stations that have the public interest standard, including those TV stations that Comcast and Disney own. So FCC regulatory action focuses on those individual stations. And one thing that we're trying to do is to empower those local stations to serve their own communities. And the public interest means you can't be running a narrow, partisan circus and still meeting your public interest obligations. It means you can't be engaging in a pattern of news distortion. We have a rule on the book that interprets a public interest standard that says news distortion is something that is prohibited. Likewise, we have a rule that addresses broadcast hoaxes. And so, again, over the years, the FCC has stepped back from enforcing it. And I don't think it's been to the benefit of anybody. Just look at the credibility of this legacy media. It's absolutely through the floor. They used to be able to say at least they were more trustworthy than Congress, but now they're even less trustworthy than Congress. And so I think as a business matter for them, something has to change. And at the FCC, we need to reinvigorate this. So again, there's actions that we can take on licensed broadcasters. And frankly, I think that it's really sort of past time that a lot of these licensed broadcasters themselves push back on Comcast and Disney and say, listen, we are going to preempt. We are not going to run Kimmel anymore until you straighten this out, because we, we licensed broadcasters, are running the possibility of fines or license revocation from the FCC if we continue to run content that ends up being a pattern of news distortion. So I think, again, Disney needs to see some change here, but the individual licensed stations that are taking their content, it's time for them to step up and say, this garbage, to the extent that that's what comes down the pipe in the future, isn't something that we think serves the needs of our local communities. But this sort of status quo is obviously not acceptable where we are.

Johnson: Yes, thank you, Mr. Chairman, for explaining it that way because I don't think that a lot of people quite understand the regulatory nightmare that a company like Disney is under in a situation like this. Because you have one, you have the company Disney, that obviously appeals and markets to children in a constant basis, and they are having one of their companies that they own, that is now maligning a hero of so many of those kids. Charlie Kirk was a Gen Z hero, and so many of those kids that were raised on Disney and Disney products, looked up to Charlie, looked up to Charlie, and to lie about his death and to not be forthright about the forces that killed him culturally, and that threaten other children, obviously, on a day-to-day basis, as we are constantly seeing, is a massive liability. Disney should get very serious about threats to children.

Carr: Yeah, I mean, Disney's got a lot of trouble. I mean, look, we've launched, I don't know if we've talked about this publicly yet, but we have launched, have launched, and are continuing to run a investigation into Disney for their DEI practices for potentially violating the FCC's equal employment opportunity rules. We've issued Disney a letter of inquiry on that. We've received some documents from them. Again, we haven't talked, I don't think publicly about that before, but that is a very active investigation that's underway into Disney on that conduct. And again, it's your point. I mean, step back for a second. But if the public interest means anything, if we're going to enforce this thing, I mean, just look at the number of hoaxes that have been run on the American people with the aid of a lot of these broadcasters. You've got, you know, you've got this, you know, the whips at the border store. You've got Covington Catholic. You've got Juicy Smollett. You've got Hunter Biden's laptop. You've got, you know, Joe Biden is sharp as a tack. You've got, you know, fake stories about hospitals being overrun by ivermectin overdoses and therefore people dying of gunshots, mostly peaceful protests. I mean, the list goes on and on and on. And again, I think whether it's the FCC through our public interest enforcement actions, whether it's as a business matter, these people need to sort of change course or frankly, the fact that they're increasingly irrelevant because President Trump has run right at them. Most politicians that just said, okay, I'll accept the narrative that mainstream media is pushing and President Trump hasn't done that. And frankly, I think not that there's a great part of the de-platforming of conservatives, but if there is any silver lining that I mean, look at what you built, look at what Charlie built. Republicans, conservatives were forced to build alternate channels of reaching out directly to the American consumer and you are winning the battle of ideas by doing that and the legacy media is struggling and they're lashing out.

Johnson: Thank you, Mr. Chairman, for saying that. Obviously, that is what made Charlie so profoundly powerful is his capacity to reach directly to the millions of grassroots supporters and then also to reach physically those supporters at large scale events, many

of which we were at together. And those are the kind of things that made him, he was able to do an end round, the gatekeepers that typically would keep someone like Charlie from ever having an audience. It actually is a remarkable moment. It's what made him frankly so dangerous to so many that wanted to see his life cut short. To honor his memory, we thank you for ensuring that the FCC is going to be enforcing these rules. A final question to you, do you believe that what Jimmy Kimmel said rises to the level of news distortion?

Carr: Look, again, the FCC could be called upon to be an ultimate judge in that, but at this point, I think it's clear, it appears to be clear, that you could make a strong argument that this is sort of an intentional effort to mislead the American people about a very core, fundamental fact, a very important matter. At the end of the day, if we do get called upon to cast a vote on this, Disney will have a chance to put in their arguments and explain it, but this is a very, very serious issue right now for Disney.

Johnson: Yes. Thank you very much, Mr. Chairman. Please follow Chairman Brendan Carr here on X, the Federal Communications Commission Chairman.

January 9, 2026

TO:

Hon. Brett Guthrie, Chair
House Committee on Energy & Commerce

Hon. Frank Pallone, Ranking Member
House Committee on Energy & Commerce

Hon. Richard Hudson, Chair
House Subcommittee on Communications & Technology

Hon. Doris Matsui, Ranking Member
House Subcommittee on Communications & Technology

CC:

Hon. Ted Cruz, Chair
Senate Committee on Commerce, Science & Transportation

Hon. Maria Cantwell, Ranking Member
Senate Committee on Commerce, Science & Transportation

Hon. Deb Fischer, Chair
Senate Subcommittee on Telecommunications & Media

Hon. Ben Ray Luján, Ranking Member
Senate Subcommittee on Telecommunications & Media

Submitted to:

House Energy & Committee
Subcommittee on Telecommunications & Technology
Noah.Jackson@mail.house.gov

Re: Full Committee hearing on FCC oversight, January 14, 2026

Dear Chairs Guthrie and Hudson, Ranking Members Pallone and Matsui, and Members of the Subcommittee,

We are writing with regard to the FCC oversight hearing to be held on January 14.[1]

We are a national coalition, with a reach across all parts of the country. Together with our coalition partner groups, we have a reach of approximately 2 million people. We advocate for the safe deployment of broadband technology.

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A. Questions to ask the FCC Commissioners on January 14

We urge all members of the committee to ask the FCC commissioners the following questions:

1. **What is the status of FCC complying with a court order issued by the US Court of Appeals for the DC Circuit in 2021[2] to provide a reasoned explanation for retaining its 1996 limits for human exposure to radiofrequency (cell tower radiation)?**
    a. What steps has the FCC taken to comply with the court order? (See page 6 below for description of the court order, which found that the FCC had ignored record evidence and failed to comply with its statutory obligations issued by Congress)

[1] https://energycommerce.house.gov/posts/chairmen-guthrie-and-hudson-announce-fcc-oversight-hearing
[2] *Environmental Health Trust, et al. v. FCC* (DC Circuit, 2021, No. 10-1025) https://media.cadc.uscourts.gov/opinions/docs/2021/08/20-1025-1910111.pdf

b. What dollar amount in the FCC's budget request is allocated for complying with the DC Circuit order?

c. When does the FCC expect to comply with and satisfy the requirements contained in the court's mandate?

2. **Will each of the commissioners here today commit to pausing the rulemaking 25-276 until the FCC has complied with the DC Circuit court order issued in 2021 to review its wireless radiation standards?**

The FCC has an open rulemaking, "*Build America: Eliminating Barriers to Wireless Deployment,"* #25-276,[3] that would dramatically preempt local government authority over the placement of wireless facilities.[4,] If enacted, the proposed rules would essentially mandate increased wireless radiation exposure upon Americans without their consent, without liability for injuries, and without any determination of safety from these exposures.[5] In 2018, when the FCC issued a similar order expanding preemption for "small wireless facilities,"[6] it was sued in federal court for failing to first determine the safety of these deployments. Petitioner wrote in its 2019 opening brief that local governments (preempted by Congress from regulating radiofrequency emissions) had:[7]

> *"asked the Commission, before speeding the widespread deployment of 5G transmitters, to evaluate recent scientific studies and confirm whether the 1996 RF standards will adequately protect public health and safety. Regrettably, the FCC refused."*

The FCC's subsequent failure to do so was found to be arbitrary and capricious, resulting in the DC Circuit remand mentioned above.[8]

Which brings us to the present day. The FCC is proposing to apply similar heavy-handed preemption as was used in the 2018 *Small Cell Order*, but this time applied to all other wireless facilities. Nearly 8 years later, the FCC has **still** not reviewed the scientific evidence on radiofrequency radiation harms. As a coalition of local governments across

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[3] Notice of Proposed Rulemaking, WT Docket 25-276, FCC 25-67. Adopted September 30, 2025
https://www.fcc.gov/document/fcc-aims-accelerate-wireless-infrastructure-buildout-0
[4] https://ehsciences.org/fcc-fast-track-cell-towers-25-276/
[5] Wired Broadband, Inc., et al, comments filed in FCC #25-276 December 31, 2026
https://www.fcc.gov/ecfs/search/search-filings/filing/12312447218213
Children's Health Defense, comments filed in FCC #25-276 December 31, 2026
https://www.fcc.gov/ecfs/search/search-filings/filing/1231084288310
[6] *Small Cell Order*, FCC 18-133
https://www.fcc.gov/document/fcc-facilitates-wireless-infrastructure-deployment-5g
[7] *Montgomery County v. FCC* (Ninth Circuit, 2019, No. 19-70147)
https://ehtrust.org/wp-content/uploads/Montgomery-County-Brief-on-Merits-filed-6-10-2019.pdf
[8] See footnote 2 above

the country (including an association of 74 municipalities in Texas) commented in this rulemaking, the *Small Cell Order* was upheld under *Chevron* deference and would be extremely unlikely to survive in today's post-*Chevron* world.[9]

Yet another coalition of local governments in Colorado and Washington state commented in this docket:[10]

> *The Coalition urges the Commission to take the Court's order seriously and get to work on reconsidering the science on radio frequency emissions safety and making a new determination on any required changes in its rules. Even if a subsequent proceeding results in no significant changes to the Commission's rules, local governments will be able to educate citizens about the process and assure them that the agency that Congress directed to address this issue has recently complied with its statutory obligations and provided this information for the American public.* ***Without such action, local governments will continue to hear the concerns and objections from their citizens, and will only be able to respond that the rules have not been updated for 29 years, and that the Commission has failed to heed the Court's directive to consider whether they ought to be updated.*** [emphasis added]

3. **Why hasn't the FCC begun a rulemaking based on the latest science[11] to update its human radiofrequency exposure guidelines?** An up-to-date review would help reassure the public that the technology the FCC is rolling out (by expanding its power of preemption over local zoning authority) is safe for children, families, wildlife and the environment?

   Current wireless exposure guidelines are largely based on the results of studies performed over 40 years ago of just 11 monkeys and 12 rats, which were exposed for less than one

[9] Local Community Coalition, comments filed in FCC #25-276 December 31, 2026, page 4 https://www.fcc.gov/ecfs/search/search-filings/filing/123152282324a

[10] Colorado-Washington Coalition, comments filed in FCC #25-276 December 31, 2025, page 56 https://www.fcc.gov/ecfs/search/search-filings/filing/123102013800

[11] See FCC Docket 13-84 on human exposure to RF scientific submissions https://www.fcc.gov/ecfs/search/search-filings/results?q=(proceedings.name:(%2213-84*%22))

hour.[12] GAO first recommended that the FCC revisit these limits back in 2012[13] and the FCC has not yet done so.

4. **Why are there no measuring and monitoring of ambient cell tower RF levels nationwide?** Many other countries have publicly posted cell tower radiation measurement data[14] but the US has no RF measurement program, nor any public information on ambient levels.[15]

B. Our proposed legislative text

Instead of the ill-conceived 25-276 rulemaking and the even worse HR 2289[16] passed in December 2025 by the full Committee, we urge you to adopt the legislative text set out below. **We also urge all members to cosponsor this text as an amendment to the NDAA of 2026.**[17]

Incentivize FCC compliance with Congressional mandates

> **The One Big Beautiful Bill Act (Public Law 119-21) is hereby amended by inserting the following text at the end of Section 40002:**
>
> **Notwithstanding anything to the contrary in Act, this section 40002 shall have no force or effect and shall not go into effect until the FCC complies with, and satisfies the requirements contained in, the mandate issued October 5, 2021 by the U.S.**

[12] International Commission on the Biological Effects of Electromagnetic Fields (ICBE-EMF), (2022). Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation: implications for 5G. Environ Health. Oct 18;21(1):92. https://ehjournal.biomedcentral.com/articles/10.1186/s12940-022-00900-9

[13] Exposure and Testing Requirements for Mobile Phones Should Be Reassessed. US GAO, 2012 https://www.gao.gov/products/gao-12-771

[14] Countries with RF limits more stringent than the USA and strict oversight programs https://ehtrust.org/u-s-government-regulations-on-cell-tower-radiation/

[15] Decades ago, the US EPA and FCC measured RF levels in various cities across the country. However the last report on such measurements was issued by the EPA in 1986 in a report entitled "Radiofrequency Radiation Environment Environmental Exposure Levels And RF Radiation Emitting Sources" http://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=2000ECTQ.txt

[16] HR 2289: American Broadband Deployment Act of 2025 https://d1dth6e84htgma.cloudfront.net/H_R_2289_American_Broadband_Deployment_Act_of_2025_825ab0e396.pdf

[17] https://www.congress.gov/bill/119th-congress/senates.2296-bill/2296

Court of Appeals D.C. Circuit in case number 20-1025. Such compliance shall consider, without limitation, input from other federal agencies with relevant expertise and materials submitted at any time prior to [the enactment date of this amendment] in FCC Dockets 13-84, 03-137, and 19-226.

The Spectrum and Secure Technology and Innovation Act of 2024 (Public Law 118-159) is hereby amended as follows: by inserting the following text at the end of section 5403:

> **Notwithstanding anything to the contrary in this Act, subsections (a) and (b) of this section shall have no force or effect and shall not go into effect until the FCC complies with, and satisfies the requirements contained in, the mandate issued October 5, 2021 by the U.S. Court of Appeals D.C. Circuit in case number 20-1025. Such compliance shall consider, without limitation, input from other federal agencies with relevant expertise and materials submitted at any time prior to [the enactment date of this amendment] in FCC Dockets 13-84, 03-137, and 19-226.**

Rationale:

Spectrum auction authority was inserted into the One Big Beautiful Bill Act (Public Law 119-21) and the "Spectrum and Secure Technology and Innovation Act of 2024" (Public Law 118-159), which was inserted in the National Defense Authorization Act (NDAA) of 2025 (HR 5009, 118th).[18] These acts granted FCC authority to auction the various bands of spectrum.

Both of these pieces of spectrum legislation had been previously introduced on their own and failed. They passed only thanks to their inclusion in larger, omnibus bills, leaving no opportunity for amendments to this legislation.

C. Failures of FCC's NPRM 25-276 and HR 2289

- **Will not bridge the digital divide.** Like other wireless preemption measures, the measures will give free reign to the wireless industry to deploy cell towers in areas that are already profitable, but without the "nuisance" of having to engage with local communities and residents to determine the siting of wireless facilities.

[18] Public 'Spectrum and Secure Technology and Innovation Act of 2024, Title LIV https://www.congress.gov/118/bills/hr5009/BILLS-118hr5009enr.pdf

- **Trample states' rights**, despite the majority's stated commitment to states' rights and the 10th amendment.
- **Distort the free market**, by suppressing normally functioning demand signals from local governments.
- **Harm and injure millions of Americans**, which is at odds with the White House commitment to Make America Healthy Again.

We refer the committee to our letter on March 5, 2025,[19] in which we highlighted the White House's Make America Healthy Again (MAHA) agenda, and its inclusion of electromagnetic radiation (EMR) as a contributing cause of chronic disease. EMR was expressly set out in the Executive Order in February,[20] reiterated in the MAHA assessment in May 2025, and reiterated again in the MAHA strategy on September 2025.[21]

Your committee now has an historic opportunity to address and mitigate the harms of electromagnetic radiation on Americans' health by preserving and enhancing local rights of Americans to determine where and how they deploy communications infrastructure, rather than mislabeling their rights to health and safety as "red tape." Unfortunately, the term "streamlining" has come to mean trampling states' rights and replacing it with heavy-handed big government in Washington DC.

We urge the committee throughout the 119th Congress not to pass any legislation that increases wireless deployments until:

> a) US government agencies with relevant expertise have determined safe limits for these exposures, and
>
> b) Congress has restored free-market principles for wireless technology, which includes product liability for wireless exposure and local government discretion over its infrastructure.

Therefore, we urge the committee to:

- Restore liability for manufacturers to allow the free market to operate
- Restore states' rights to make decisions about their own infrastructure
- Create safety limits and oversight to protect the public

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[19] National Call for Safe Technology, Written Testimony for the Hearing on Rural Broadband on March 5, 2025 https://thenationalcall.org/wp-content/uploads/2025/03/NC4ST-to-House-EC-on-Broadband-Hearing-3-5-25-FINAL.pdf

[20] See §4a https://www.federalregister.gov/documents/2025/02/19/2025-02871/establishing-the-presidents-make-america-healthy-again-commission

[21] https://www.whitehouse.gov/wp-content/uploads/2025/09/The-MAHA-Strategy-WH.pdf

- Ensure taxpayer broadband funding is spent only on futureproof wired broadband

D. Background on FCC radiofrequency exposure limits

Since 2021, the FCC has ignored the US Court of Appeals DC Circuit order, issued in the successful lawsuit *Environmental Health Trust et al. v. FCC,* to provide a "reasoned explanation" for why the FCC decided not to update its human exposure limits for wireless radiation.[22] The FCC has not considered the latest science since 1996, as it is otherwise obligated to do under the law. Making more spectrum available while failing to update its exposure limits puts all Americans at risk, and is harming millions of Americans.[23,24]

Petitioners in this case have filed multiple follow-on petitions with the FCC to comply with the court order, spelling out exactly what the FCC must do to comply with the court.[25]

Current wireless exposure standards are based largely on 11 monkeys and 12 rats, which were exposed for less than one hour, over 40 years ago, with no control group.[26] GAO first recommended that the FCC revisit these limits back in 2012[27] and the FCC has not yet done so.

The legislative text we propose above would incentivize FCC to follow the law. Complying with laws passed by Congress and a court order is not optional for the FCC – this is an administrative

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[22] *Environmental Health Trust, et al. v. FCC* (DC Circuit, 2021)
https://media.cadc.uscourts.gov/opinions/docs/2021/08/20-1025-1910111.pdf
[23] National Call for Safe Technology, Congressional Briefing, 5/19/24
https://thenationalcall.org/wp-content/uploads/2024/05/Congressional-Briefing-5-19-24-FINAL.pdf
[24] See "Comments of Advocates for the EMS Disabled," In the Matter of Advance Notice of Proposed Rulemaking-Public Comment on Changes to Requiring Accessibility and Prohibiting Discrimination on the Basis of Disability in HUD -Assisted Programs, Docket FR 6257-A-01. 7/24/23
https://thenationalcall.org/wp-content/uploads/2023/09/HUD-Submission-7-24-23-Final.pdf
[25] Petition To Implement D.C. Circuit Judgment And Mandate, Reopen Notice Of Inquiry, And Perform Tasks Ordered By The Court, And Request For Prompt Administrative Action, Filed by Environmental Health Trust, August 6, 2025
https://www.fcc.gov/ecfs/search/search-filings/filing/10806965028484
and Joinder In Environmental Health Trust Petition To Implement D.C. Circuit Judgment And Mandate, Reopen Notice Of Inquiry And Perform Tasks Ordered By The Court, And Request For Prompt Administrative Action And Renewed Separate Motion For Similar Relief, filed by Children's Health Defense, November 25, 2025
https://www.fcc.gov/ecfs/search/search-filings/filing/112586420384
[26] International Commission on the Biological Effects of Electromagnetic Fields (ICBE-EMF). Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation: implications for 5G. Environ Health 21, 92 (2022).
https://doi.org/10.1186/s12940-022-00900-9
[27] Exposure and Testing Requirements for Mobile Phones Should Be Reassessed, GAO-12-771, Jul 24, 2012
https://www.gao.gov/products/gao-12-771

agency acting with impunity, while 100% of its budget is paid for by the industry it is supposed to be regulating.[28]

Making spectrum available for commercial use will automatically trigger heavy-handed preemption of states' rights over wireless facilities, known as Section 6409,[29] a provision that would be dramatically expanded under HR 2289. As soon as more spectrum is made available, carriers across the country can add almost unlimited additional antenna and additional power output on their existing facilities to emit radiofrequency radiation using the new spectrum – despite no US government agency assessing these emissions for safety.[30] Hundreds of localities around the country have sued the FCC over its rules implementing section 6409.[31]

We would be happy to discuss this letter and related matters further with you.

Attachment 1. Factsheet on HR 2289
Attachment 2. Congressional briefing on wireless infrastructure policy
Attachment 3. Science compendium on biological hazards of wireless radiation

Respectfully submitted,



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[28] FCC Budget in Brief, FY 2025. https://docs.fcc.gov/public/attachments/DOC-401129A1.pdf
[29] Section 6409 states:
"a State or local government may not deny, and shall approve, any eligible facilities request"
See Middle Class Tax Relief and Job Creation Act of 2012, Public Law 112–96, 47 USC 1455.
[30] Testimony submitted to Senate Commerce Committee, March 27, 2024
https://ehtrust.org/wp-content/uploads/EHT-Testimony-to-Senate-Commerce-Committee-on-S3909-03272024.pdf
[31] See, e.g., *Montgomery County et al. v. FCC* (Fourth Circuit, No. 15-1240, 2015)
T-Mobile v. San Francisco 658 F. Supp. 3d 773 (N.D. Cal. 2023)
League of California Cities et al. v. FCC (Ninth Circuit, No. 20-71765, 2024)

OPPOSE HR 2289 (119th Congress)

Bill Would Eliminate Local Authority Over Communications Infrastructure

What this bill does:

- Eliminate states' rights and preempt all local control over the placement of wireless facilities
- Forces local governments to rubber-stamp virtually all wireless facilities
  - If they don't rubber-stamp, the facilities would be built without a permit[1]
- Says the FCC will control state and federal courts, exponentially increasing its power
- Exempts almost all wireless facilities from review for human health effects under NEPA[2]

Why you should oppose it:

- Will harm, injure, and disable millions of Americans who will be involuntarily irradiated[3]
- Removes the possibility of informed consent
- Decreases property values for millions of Americans
- Violates constitutional protections for due process, property takings, and anti-commandeering of states. Exceeds the limits of federal power under the Commerce Clause
- Will not bridge the digital divide or address market failures in rural broadband deployment

Specific preemption provisions[4]

Antennas on *any* structure automatically approved. Says that local governments "may not deny and shall approve" (Sec 103, page 37 line 20) any antenna on any structure that "*could* support transmission equipment" (Sec 103, page 48 line 3), even if the location was never permitted for antennas. In this dramatic expansion of Section 6409 preemption (47 USC 1455), local governments would have no control over new antennas on ***any structure*** – for example, utility poles, light poles, buildings, overhead wires, apartments, single-family houses, schools, buildings, and more. Based on available data, antennas on existing structures represent at least 98% of deployments since 2020.

New structures impossible to deny. In the cases where a carrier would like to build a new tower (less than 2% of deployments), local governments would be forced to approve these – even in the front yard of a single-family home. 47 USC 332(c), which governs the siting of wireless facilities, would be amended so that local governments cannot prohibit the "improvement or enhancement" of *any* wireless service, including data service. (Sec 101, page 4 line 1) This is a massive shift from current law. Under the 1996 Telecom Act, federal appeals courts require carriers to show a gap in voice service in order to justify new deployments. HR 2289 has no such limiting condition on the number of towers to achieve a desired service level; carriers can always claim (without showing

[1] *Montgomery County, et al. v. FCC* (Fourth Circuit, 2015, No. 15-1240)
[2] National Environmental Policy Act
[3] National Call Congressional Briefing on Wireless Infrastructure
[4] Page and line numbers refer to the American Broadband Deployment Act of 2025 adopted by the House Energy & Commerce Committee 12/3/25

evidence) that an additional tower might yield a slight enhancement or slightly higher data rates (Sec 101 page 21 line 10) and override local zoning. If a local government attempts to deny a permit under this bill, it must include a detailed explanation to be publicly released in writing on the same day of the decision, a near-impossible hurdle for decisions made during a public meeting in accordance with state laws (Sec 101, page 15 line 6; Sec 102 page 30 line 7; Sec 103 page 53 line 18).

FCC in control of <u>all</u> courts. In an outright attack on Article III of the Constitution, the bill says that state and federal courts (including the Supreme Court) will be bound by FCC rules and interpretations. The provisions give the FCC more power than it ever had before *Chevron* was overturned. (Sec 101 page 19 line 4; Sec 102 page 36 line 4; Sec 103 page 46 line 9). In the rare case where a local government might quixotically try to deny a wireless deployment, carriers would go to a court which would be forced to rubberstamp FCC's draconian preemption interpretations.

FCC annulment authority: Dramatically expands FCC's obligation to cancel any local law or regulation that it deems inconsistent with improving or enhancing any service (Sec 102 page 34 line 4) and expands the scope of section 253 to data services (Sec 102, page 37 line 6).

Shot clocks expanded. Converts existing FCC shot clocks from guidelines into deadlines, giving local governments only 10 days for a small cell or 30 days for all other wireless; thereafter, local governments must accept incomplete applications (Sec 101, page 8 line 21, page 9 line 21).

Deemed granted applications. If a local government does not comply with the shot clock, applications would be automatically, or "deemed," granted (Sec 101 page 13 line 22; Sec 102 page 29 line 5; Sec 103 page 38 line 11).

No moratoria. Prohibits local governments from pausing applications for wireless, telecommunications, cable facilities, or cable franchises (Sec 101, 102, 103, 202; pages 8, 15, 50, 58).

Cable broadband. Localities would generally be (1) forced to accept any applicant to build a cable network (2) prohibited in perpetuity from letting any contract expire and (3) stripped of oversight upon cable operators selling or transferring their franchise (Title II).

NEPA and NHPA[5] exemptions. Exempts most wireless facilities from these environmental and historic preservation reviews, including for impacts on human health (Title III).

Opposed by:

- National Association of Counties (NACO), National League of Cities (NLC), US Conference of Mayors, National Association of Telecommunications Officers and Advisors (NATOA)
- MAHA Action
- American Public Power Association
- National Association of Towns and Townships and its members in Pennsylvania and Michigan

[5] National Historic Preservation Act

National Call for Safe Technology

www.thenationalcall.org

Congressional Briefing: Wireless Infrastructure Policy

Americans are being exposed to the hazards of wireless technology, which are unnecessary to reap its benefits. We advocate for responsible policy.

Hazards of current and proposed policies on wireless deployment:

1. **Regulatory gap: lack of oversight** no US government agency is protecting Americans from exposure to wireless radiation
   - 1996: FCC issues exposure guidelines,[1] while ignoring input from EPA[2]
   - 2012: GAO report recommends FCC review its 1996 exposure limits[3]
   - 2013-19: FCC opens docket and receives 11,000 pages of scientific studies of harm[4]
   - 2019: FCC closes the docket and decides not to update its wireless limits[5]
   - 2021: US Court of Appeals DC Circuit rules that FCC's decision not to update exposure limits was "arbitrary and capricious";[6] FCC has not yet complied with the court order to address long-term exposure effects, including on children
   - FCC responsible for exposure guidelines despite having no health or safety competency.
     - There is no independent safety body, like NTSB for transportation
2. **Evidence of biological harm is clear and convincing**, for human health (cancer and noncancer), children, plants, animals, insects, and microbes[7]
3. **Ignores millions of Americans disabled by wireless radiation[8]**
4. **Subverts the free market** by imposing federal government mandates that override the free market and force experimental technology on Americans[9]
5. **Shields industry from liability** rather than encouraging industry to compete on safety[10]
6. **Tramples states' rights and local government on cell tower zoning and placement**
   6.1. Tenth amendment issues: preempts states from regulating cell towers on the basis of radiofrequency emissions, while the federal government is not doing so.[11]
   6.2. Fifth Amendment takings issues: federal preemption is a regulatory and physical taking of private property and public property in rights-of-way, and drops property values without compensation[12,13]
   6.3. Commerce clause overreach: while one can choose to abstain from a regulated activity,[14] federal policy essentially commands that all Americans suffer involuntary exposure and property devaluation.
7. **Farm yields and cattle lifespan** threatened by wireless radiation[15]
8. **Fire and wildfire risks** from cell towers, which are electrical installations and have already caused disasters, including damage of $6 billion in one fire[16]
9. **Cybersecurity risks** are far greater with wireless networks, 5G being the least secure, as former FCC Chairman Tom Wheeler refers to "The 5G Cyber Paradox."[17]

Solutions: we ask Congress to:

- Restore liability for manufacturers to allow the free market to operate
- Restore states' rights to make decisions about their infrastructure
- Create safety limits and oversight to protect the public
- Ensure taxpayer broadband funding is spent only on futureproof wired broadband

Wireless interferes with broadband policy goals

10. Waste of public funds:
- 10.1. Fiber infrastructure's lifespan is fifty years (or more); wireless infrastructure's lifespan is only 5 years, making it a poor use of taxpayer subsidies.[18]
- 10.2. Billions of dollars in subsidies to wireless have not provided the promised ubiquitous service.[19]
- 10.3. Wireless and wired are not functionally equivalent technologies and therefore should not be treated on a "technology neutral" basis:[20] wireless suffers from line-of-sight obstructions, slower speed, inclement weather, and lack of scalability, whereas fiber is sustainable, renewable and futureproof.[21]

11. Energy consumption is far higher with wireless networks; 5G expected to increase energy consumption up to 61x between 2020 and 2030.[22]

12. Wireless will perpetuate the digital divide, not solve it [23]

[1] The limits were based largely on just a few animal studies with 11 monkeys and 12 rats, with no control group, in the 1970s and early 1980s.
International Commission on the Biological Effects of Electromagnetic Fields (ICBE-EMF), (2022). Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation: implications for 5G. Environ Health. Oct 18;21(1):92
[2] See note 7 below, at footnote 31 of Environmental Health Trust testimony, 3/27/24.
[3] Exposure and Testing Requirements for Mobile Phones Should Be Reassessed. US GAO, 2012
https://www.gao.gov/products/gao-12-771
[4] https://ehtrust.org/environmental-health-trust-et-al-v-fcc-key-documents/
[5] Resolution Of Notice Of Inquiry, Docket 13-84, 12/4/19 https://www.fcc.gov/document/fcc-maintains-current-rf-exposure-safety-standards
[6] *Environmental Health Trust et al. v. FCC*, 2021, DC Circuit

- The D.C. Circuit Court of Appeals ruled against the FCC for its failure to provide a reasoned explanation under the Administrative Procedures Act to maintain its 1996 wireless exposure limits without addressing extensive evidence of harm. The docket contained 11,000 pages of scientific, peer-reviewed studies showing harm below the FCC limits, including accounts of injury. The court wrote that the FCC failed to respond to "record evidence that exposure to RF radiation at levels below the Commission's current limits may cause negative health effects unrelated to cancer."
- The Court ordered the FCC to address impacts on children, long-term exposure effects on health, and the environment. To date, the FCC has failed to comply with the court order. Therefore, its 1996 limits cannot be relied upon to protect the public.

https://www.cadc.uscourts.gov/internet/opinions.nsf/FB976465BF00F8BD85258730004EFDF7/$file/20-1025-1910111.pdf
[7] See testimony submitted by Environmental Health Trust to Senate Commerce Committee, 3/27/24, regarding spectrum policy and harms from radiofrequency radiation
https://ehtrust.org/wp-content/uploads/EHT-Testimony-to-Senate-Commerce-Committee-on-S3909-03272024.pdf
National Toxicology Program 2018: clear evidence of cancer (highest level of evidence)
https://ntp.niehs.nih.gov/whatwestudy/topics/cellphones#studies
Woman living near cell tower diagnosed with 51 strokes,
https://www.momsacrossamerica.com/woman_living_near_cell_tower
[8] See Reply Comments of Advocates for the EMS Disabled, FCC Docket 22-69
https://thenationalcall.org/wp-content/uploads/2023/09/FCC-Reply-Comments-EMS-Disabled-Docket-22-69-DEI-NPRM-4-20-23-FINAL.pdf
[9] If wireless were so safe and desirable, why does the federal government need to trample on local governments to force deployment? As an example of federal preemption mandating deployments, section 6409 of the 2012 Middle Class Tax Relief and Jobs Act (47 USC §1455), under which the majority of wireless facilities are deployed today, mandates that: "a State or local government may not deny, and shall approve, any eligible facilities request."
[10] The plain text of 47 USC §332(c)(7)(B)(iv) preempts zoning decisions on the placement of cell towers on the basis of environmental effects of radiofrequency emissions within FCC regulations. Courts have inappropriately expanded deference to FCC's limits resulting in shielding industry from tort liability, in effect creating a safe harbor for industry, while leaving the public exposed. For example, in *Cohen v. Apple* (2022, Ninth Circuit, No. 20-17307, petition for certiorari denied), the court wrote: "FCC's regulations…preempted state laws that imposed liability premised on levels of radiation below the limits set by the FCC." See amicus brief by Children's Health Defense (2023) https://www.supremecourt.gov/DocketPDF/22/22-698/263539/20230414130203673_22-698%20%20Amicus%20Brief.pdf
Walker v. Motorola Mobility, 2:21-CV-00923 (W.D. La. 2023). The court wrote (at 22): "state law claims attacking the safety of the SAR Standard are preempted by federal law. Though the **FCC disclaimed any expertise in health**

or safety, it set the SAR standard under a congressional mandate and in service of its broad statutory mandate to provide a uniform, efficient network." [Emphasis added] https://casetext.com/case/walker-v-motorola-mobility-llc
While companies are shielded from tort liability, at the same time the insurance industry does not insure these risks. Swiss Re calls 5G an "off the leash" insurance risk (see p.10-11). Telecoms warn shareholders of potential liability from health effect claims. Companies should compete on safety; some already recognize this. E.g., Swisscom patent to reduce wireless radiation because of the risk of cancer and neurological disorders, Int'l Pub'n No. WO 2004/075583 A1 2 Sept 2004 PCT, https://www.avaate.org/spip.php?article2061 and by cell phone manufacturers.

[11] *Murphy v. NCAA* US 2018, https://www.supremecourt.gov/opinions/17pdf/16-476_dbfi.pdf

[12] Cell towers inflict wireless pollution on private property, reducing the habitability of that property, without just compensation. See memorandum on constitutional considerations, section 1.c, for a discussion of Fifth Amendment case law
https://docs.google.com/document/d/1DBTtngzDuZ9Ibmze58gBXsJs1jXzU5dQZx0ycFQumUk/edit#heading=h.6cyqdt7korzl
Cell towers decrease property values: Wireless Towers and Home Values: An Alternative Valuation Approach Using a Spatial Econometric Analysis, 2017, https://link.springer.com/article/10.1007/s11146-017-9600-9

[13] https://www.emfanalysis.com/property-values-declining-cell-towers/?iframe=1&iframe=1&iframe=1

[14] *Nat'l Fed'n of Indep. Bus. v. Sebelius*, 567 U.S. 519, 553-54, 573-74 (2012).

[15] https://ehtrust.org/wireless-radiofrequency-radiation-effects-on-agriculture/
European Court shut down a cell tower for 20% reduction in cows' milk yield and the death of 40 cows.

[16] E.g., Woolsey Fire in CA 2018 caused $6 billion in damages, destroyed 100,000 acres, 295,000 people evacuated, [three deaths]
https://ehtrust.org/wp-content/uploads/wildfire-cell-tower-fact-sheet-EHT-2-11-24.pdf

[17] 5G, as a software based system, is easily hacked.
https://www.cyber.forum.yale.edu/blog/2021/7/20/cybersecurity-risk-in-5g?iframe=1
Tom Wheeler noted that the structure of 5G networks to provide for additional capability "also introduce[s] new security vulnerabilities." https://www.brookings.edu/articles/the-digital-future-requires-making-5g-secure/

[18] Tom Wheeler, former FCC chair and former CEO of CTIA, testified in 2021 that fiber is future proof with **wireless only as a last resort,** https://democrats-energycommerce.house.gov/sites/evo-subsites/democrats-energycommerce.house.gov/files/documents/Witness%20Testimony_Wheeler_FC_2021.03.22.pdf.
Fixed Wireless Technologies and Their Suitability for Broadband Delivery, June 2022
https://www.benton.org/publications/FixedWireless

[19] In testimony to the House Energy and Commerce Committee, 3/ 2221, former FCC Chair and former CTIA CEO Tom Wheeler spoke disappointingly that despite approximately $40 billion of government subsidies "over the last decade," those subsidies "have failed to deliver the goal of universal access to high-speed broadband … because it failed to insist on futureproof technology, … and focused more on the companies being subsidized than the technology being used or the people who were supposed to be served."
https://democrats-energycommerce.house.gov/sites/evo-subsites/democrats-energycommerce.house.gov/files/documents/Witness%20Testimony_Wheeler_FC_2021.03.22.pdf

[20] A principle of the Telecom Act of 1996 is nondiscrimination among functionally equivalent services. Correlatively, treating as the same services that are not functionally equivalent is discriminatory against services with superior service characteristics – in this case, discriminatory against wired broadband. For example, see 47 USC §160, §224(e)(1), §253(c), §332(c)(7)(B)(i)(I).

[21] https://www.benton.org/blog/how-fixed-wireless-technologies-compare-fiber

[22] https://ehtrust.org/science/reports-on-power-consumption-and-increasing-energy-use-of-wireless-systems-and-digital-ecosystem/

[23] House Energy & Commerce Committee, 1/29/20 testimony
https://docs.house.gov/meetings/IF/IF16/20200129/110416/HHRG-116-IF16-Wstate-SieferA-20200129.pdf
"House Energy & Commerce Committee, 9/21/23 witness, "Fiber is the most scalable, reliable, long-term, future proof strategy we have."
https://www.youtube.com/watch?v=ptQJ_wbtHYc&t=6029s

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Biological Hazards of Wireless Radiation – Executive Summary

The FCC's standards for wireless radiation were established back in 1996, and have not been reviewed, updated or verified despite significant changes in the wireless technology in use today. The FCC's standards relate solely to wireless radiation's thermal impacts on a body (e.g. how the body reacts to being heated), and do not consider other known adverse biological impacts of non-thermal levels of RF radiation (such as damage to DNA or other changes to cells). The FCC's limits were established long before the existence of 2G, 3G, 4G, or 5G technology.

Congress eliminated the EPA's funding for electromagnetic research in 1996, knee capping the EPA from studying biological impacts of RF radiation for nearly 30 years. *At the very least, the FCC's standards should be reconsidered (FCC is under federal court order to do so, but has not) given current technology.*

Wireless radiation, also referred to as radio frequency (RF) radiation, produces biological effects and evidence of its hazards are clear and convincing, yet the hazards are not generally publicized, and the hazards are unnecessary to reap the benefits of wireless technology.

- **Industry Funded Research** – The wireless industry has funded studies that show adverse biological impacts. A 1990s $28.5 million study found that RF radiation produces biological effects that are potentially hazardous to humans in ways that have nothing to do with heated tissue. A 2000 study for a major telecom carrier found RF radiation has links to cancer, neurological disorders and cognitive impairment. Insurance companies will not insure for personal injury from RF radiation, reflecting their concerns about the possible magnitude of their liability, e.g., that 5G is a high, "off the leash" risk.

- **Reports from Federal Agencies** – A 2018 $30 million US National Toxicology Program (NTP) study found "clear evidence of cancer" in lab rats from wireless radiation. In 2019, the FCC admitted that RF radiation can have non-thermal impacts on humans, but it has conducted no studies to determine what those impacts might be or what changes should be made to its RF radiation emission limits. In 2021, the DC Circuit Court of Appeals ruled in *Environmental Health Trust, et al* v. *FCC* that the FCC's lack of action was arbitrary and capricious for failing to review its emission standards in light of new science and current technology and that it should consider non-cancer health impacts of wireless radiation. So far, the FCC has failed to comply with the Court order. As early as 1971, the US Naval Medical Research Academy concluded from 2300 studies that RF radiation, including millimeter (e.g. 5G), are linked to cardiac, neurological and other disorders.

- **Independent Studies** – Several major independent studies have concluded biological effects from RF radiation, including by the World Health Organization in 2025 (finding increased risk of cancer, along with its initial Class 2B carcinogen classification in 2011), the Ramazzini Institute in 2018 (clear evidence of cancer in lab rats, corroborating the NTP's results) and the New Hampshire Commission in 2020 (all forms of wireless radiation are harmful). The American Academy of Pediatrics warns that children are disproportionately affected by cell phone radiation. Studies concluded increased risk for ADHD, delayed motor skills, diabetes and demyelination of fetuses' brain neurons.

- **Chronic Diseases and Clusters near Cell Towers** – Illnesses near cell towers, e.g., nausea, rashes, stroke, atrial fibrillation and a variety of cancers, have been documented near Duluth, MN (51 strokes), Pittsfield, MA (17 residents fell ill and many evacuated, one resident who remained died), Ripon, CA (4 children and 4 teachers developed cancer; one child died) and Eagle, ID (atrial fibrillations from 5G cell towers).

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BIOLOGICAL HAZARDS OF WIRELESS RADIATION -- SOME HIGHLIGHTS
July 1, 2025

"The evidence presented to the Board includes well over one thousand peer-reviewed scientific and medical studies which consistently find that pulsed and modulated RFR has bio-effects and can lead to short- and long-term adverse health effects in humans, either directly or by aggravating other existing medical conditions. Credible, independent peer-reviewed scientific and medical studies show profoundly deleterious effects on human health, including but not limited to: neurological and dermatological effects; increased risk of cancer and brain tumors; DNA damage; oxidative stress; immune dysfunction; cognitive processing effects; altered brain development, sleep and memory disturbances, ADHD, abnormal behavior, sperm dysfunction, and damage to the blood-brain barrier."[1]

~ Board of Health, Pittsfield, MA, Emergency Cease & Desist Order to remove cell tower that was sickening 17 residents simultaneously.

What the Industry Knows About the Biological Hazards of RF Radiation:

1. **Industry Funded Research Finds Biological Effects**. A 1990s research program funded by the wireless industry at $28.5 million under the independent non-profit, Wireless Technology Research, LLC (WTR), found that wireless radiation (i.e., non-thermal radiation) is **biologically active producing biological effects and potentially hazardous to human health**.[2] That means the radiation does not need to heat human tissue. (Note that the FCC limits only account for thermal, not non-thermal, adverse effects.)
    a) The research was peer-reviewed with scientific oversight by both an independent Peer Review Board at the Harvard School of Public Health and a U.S. Government Interagency Working Group, chaired by the FDA, and including EPA, OSHA, NIOSH, CDC, FCC, and NIH.[3]
    b) Abruptly after these findings, the EPA was defunded from doing any further research on the biological effects of wireless radiation.[4]

2. **Industry Commissioned Study Finds Biological Effects.** A study in 2000 commissioned by a major telecom carrier found links to cancer, leukemia, neurological disorders and cognitive impairment, with special caution for children and an acknowledgement of those already disabled from the radiation.[5]

[1] https://ehtrust.org/cease-and-desist-order-against-verizon-cell-tower-by-board-of-health-pittsfield-ma/, see below the fold for link to the Order at 3, 2nd "Whereas" clause, paragraph #1.
[2] Wireless Phones and Health II: State of the Science 2002 Edition, edited by George L. Carlo; Wireless Phones and Health: Scientific Progress, edited by George L. Carlo.
[3] Ibid.
[4] Overpowered, What Science Tells Us About the Dangers of Cell Phones and Other WiFi-Age Devices, Martin Blank, PhD, 2014 at 110-112.
[5] T-Mobil Deutsche Telekom commissioned study by the Ecolog-Institute, April 2000, "Mobile Telecommunications and Health Review of the Current Scientific Research in View of Precautionary Health Protection," https://ehtrust.org/wp-content/uploads/ecolog2000.pdf.

National Call for Safe Technology

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3. **Industry Patents Point to Health Risks.** Telecom and cell phone manufacturers have filed patents to reduce the level of wireless exposure tied directly to health risks such as neurological disorders and cancer.[6]

4. **Risk Warnings of Litigation.** Industry annual reports warn their shareholders of litigation risk from potential personal injury claims from RF radiation and potential financial losses.[7]

5. **RF Radiation is a Pollutant.** The telecom industry characterizes RF radiation as a pollutant in their device protection plans and disclaim insurance liability.[8]

6. **Insurance Companies Exclude Injury Coverage for RF Radiation.** Insurance companies such as Lloyd's of London will not insure for personal injury from RF radiation because of the high risk of claims, with Swiss Re characterizing "5G" as "high," "off-the-leash" risk.[9]

7. **No 5G Pre-Market Testing.** Telecom executives during a Feb. 2019 Senate hearing confirmed no industry pre-market testing of 5G for public health or safety. Sen. Blumenthal (CT) criticized the FCC and FDA for inadequate answers on questions of public health, and concluded, "We're kind of flying blind here as far as health and safety is concerned." [10]

8. **"Why Tech Leaders Don't Let Their Kids Use Tech."[11]** The article reports that technology executives restrict or forbid their children's use of the very technology that they are providing to the public, including "the makers of smartphones and tablets, of social media channels and game boxes." Technology "titans" such as former Apple's Steve Jobs and Bill and Melinda Gates have admitted to placing restrictions on their children's use of technology. Chris Anderson, former Wired magazine

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[6] Swisscom patent, 2004 at https://www.dropbox.com/scl/fi/nwdfklq7r7j2wwsipv7ws/SwissCom-Patent-application-2003-2004-WO2004075583A1-1-1.pdf?rlkey=liuy6175hamj24lbuszpe7vux&st=5p2oy0ji&dl=0; "Manufacturers Own Patents to Cut Radiation," RCR Wireless, June 4, 2001 at https://www.dropbox.com/scl/fi/0rfwys743dgeqpifwu3ua/Manufacturer-own-patents-to-cut-radiation-RCR-Wireless-News.pdf?rlkey=e5hm46nyp9an6ugu4y005ldm3&st=xr7ocreh&dl=0.

[7] AT&T, Inc., 2021 Annual Report, https://investors.att.com/~/media/Files/A/ATT-IR-V2/financial-reports/annual-reports/2021/complete-2021-annual-report.pdf at 41.
Verizon's 2021 U.S. SEC Form 10–K at 17, https://www.verizon.com/about/sites/default/files/2020-Annual-Report-on-Form-10-K.PDF.

[8] Exclusions of loss from electromagnetic radiation from insurance coverage:

- Verizon, Sec B "Exclusions," Subsection 16 "Pollution," https://ehtrust.org/wp-content/uploads/device-protection-brochure-nationwide.pdf;
- AT&T, Sec II "Exclusions," Subsection H. Loss from "Pollutants," Sec IX.T. Definition of "Pollutants," https://ehtrust.org/wp-content/uploads/ATT-Multi-Device-Protection-Pack-Insurance.pdf;
- Sprint, Sec II "Exclusions," Subsection H. Loss from "Pollutants," Sec IX.P. Definition of "Pollutants," https://ehtrust.org/wp-content/uploads/Sprint-Insurance-Terms-and-Conditions-Downloaded-2019.pdf.

[9] https://ehtrust.org/key-issues/electromagnetic-field-insurance-policy-exclusions/.

[10] https://ehtrust.org/health-effects-of-5g-wireless-technology-confirmed-at-us-senate-hearing-after-senator-blumenthal-questions-industry/; see also, https://mdsafetech.org/2019/02/13/no-research-on-5g-safety-senator-blumenthal-question-answered/.

[11] "Why Tech Leaders Don't Let Their Kids Use Tech," https://kidzu.co/health-wellbeing/why-tech-leaders-dont-let-their-kids-use-tech/.

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editor and CEO of 3D Robotics, said that his kids "accuse me and my wife of being fascists and overly concerned about tech, and they say that none of their friends have the same rules. That's because we have seen the dangers of technology firsthand. I've seen it in myself, I don't want to see that happen to my kids."[12]

What Federal Agencies Know About the Biological Effects of Wireless Radiation and Have Disregarded:

1. **Food and Drug Administration (FDA).** The U.S. National Toxicology Program's (NTP) 2018 report concluded **clear evidence of cancer** in lab rats from wireless radiation (similar to 2G and 3G cell phones).[13] NTP found malignant heart schwannomas and malignant brain gliomas.[14] NTP is one of the most prestigious toxicology institutions in the world. In 1999, the FDA had nominated the NTP to conduct a $30 million study of RF radiation "with a high priority," to conduct animal studies, stating that it was "not scientifically possible to guarantee that non-thermal levels of microwave radiation . . . will not cause long-term adverse health effects."[15]
    a) Dr. Linda Birnbaum, former NIH and NTP director, has stated: "Every agent known to cause cancer in humans will also produce it in animals when adequately tested."[16] **"**Overall, the NTP findings demonstrate the potential for RFR **to cause cancer in humans**."[17] [Emphasis added.]

2. **Federal Communications Commission (FCC).**
    a) The FCC admitted in 2019 that at least some types of RF radiation can cause instantaneous non-thermal adverse effects with RF radiation frequencies ranging between 3 KHz and 10 MHz.[18] The FCC averages exposure levels over 30 minutes,[19] which completely obscures the

[12] Ibid.
[13] See letter of Dr. Birnbaum, former NIH and NTP Director, and hyperlinked amicus brief https://www.dropbox.com/scl/fi/nc7l00p8zxk8tj0l2a1yr/Dr.-Linda-Birnbaum-cell-tower-letter.pdf?rlkey=vq1i363i74umg9ybydrrhmn5d&st=q9l49h88&dl=0 ; see also, https://ehtrust.org/former-niehs-director-dr-linda-birnbaum-interviewed-about-cell-phone-radiation/.
[14] https://ntp.niehs.nih.gov/whatwestudy/topics/cellphones#studies *Environmental Health Trust, et al v. FCC*, Motion for Leave to File Brief of Amicus Curiae Joseph Sandri in Support of Petitioners Urging Reversal, Aug. 5, 2020, https://ehtrust.org/wp-content/uploads/20-1025-Amicus-Brief-Joe-Sandri.pdf.
[15] Note that the following letter is no longer available at the below URL, although it was originally accessed from there. Letter from the Dept of Health and Human Services to the National Toxicology Program at the National Institute for Environmental Health Studies, May 19, 1999, https://ntp.niehs.nih.gov/sites/default/files/ntp/htdocs/chem_background/exsumpdf/wireless051999_508.pdf.
[16] Dr. Birnbaum's statement in Attorney Joe Sandri's Amicus Brief filed 8-5-2020 in connection with *Environmental Health Trust, et al v. FCC, https://ehtrust.org/fcc-amicus-briefs/* (below the fold, right column) at 9.
[17] Ibid, 11.
[18] Proposed Changes in the Commission's Rule Regarding Human Exposure to Radiofrequency Electromagnetic Fields, 34 FCC Rcd 11687, 11743-11745, ¶¶122- 124 & nn. 322-335 (2019).
[19] 47 CFR 1.1307(b)(2): "Time-averaging period is a time period not to exceed 30 minutes for fixed RF sources or a time period inherent from device transmission characteristics not to exceed 30 minutes for mobile and portable RF sources," https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-1/subpart-I/section-1.1307#p-1.1307(b).

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effects of the constant peaking and pulsations of RF radiation which causes adverse health effects, and does not account for 24/7 exposure by the population.[20]

b) The FCC received in its docket, when requesting public comment on the adequacy of its 1996 RF radiation emission limits, 11,000 pages of peer-reviewed, scientific studies showing biological effects from RF radiation and a couple hundred personal submissions of injury. When the FCC closed the docket, it declined to update its limits. The FCC was sued and in 2021 the D.C. Circuit Court of Appeals ruled against the FCC and remanded the case back to the FCC because the FCC failed to provide a reasoned explanation for not updating its limits and ignoring the current science.[21] The FCC has not yet complied.

c) **FCC's Maximum Permissible Exposure Limit (MPEL)** are the limits of RF radiation for human exposure. MPEL allows for a very high human exposure limit of ten million microwatts per square meter.[22] The FCC has acknowledged a "worst-case" scenario of transmitters "operating simultaneously and continuously" at the MPEL with an individual "in the main transmitting beam and within a few feet of the antenna for several minutes or longer."[23] While the FCC dismisses this scenario as "extremely remote," it is allowing 4G and 5G cell

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[20] Human-made electromagnetic fields: Ion forced-oscillation and voltage-gated ion channel dysfunction, oxidative stress and DNA damage (Review) (2021) Pangopolous DJ, et al. International Journal of Oncology. August 23, 2021. https://pubmed.ncbi.nlm.nih.gov/34617575/.

Computational modeling investigation of pulsed high peak power microwaves and the potential for traumatic brain injury. Sci Adv. 2021 Oct; 7(44). https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8555891/. "These studies reveal that the MAE threshold depends on the energy in a single pulse (not the average power density) for sufficiently short pulses [e.g., 32 µs in (46)], and peak power densities of 102 to 105 mW/cm2 have been known to cause auditory effects in human participants (45)."

"Diplomats' Mystery Illness and Pulsed Radiofrequency/Microwave Radiation," Dr. Beatrice Golomb. Neural Comput. 2018 Nov; 30(11):2882-2985. https://pubmed.ncbi.nlm.nih.gov/30183509/; "Reported facts appear consistent with pulsed RF/MW as the source of injury in affected diplomats."

"5G: Great risk for EU, U.S. and International Health! Compelling Evidence for Eight Distinct Types of Great Harm Caused by Electromagnetic Field (EMF) Exposures and the Mechanism that Causes Them," Martin L. Pall, PhD, https://peaceinspace.blogs.com/files/5g-emf-hazards--dr-martin-l.-pall--eu-emf2018-6-11us3.pdf.

Belyaev, I., Dean, A., Eger, H. et al. "EUROPAEM EMF Guideline 2016 for the prevention, diagnosis, and treatment of EMF-related health problems and illnesses." Rev environ Health. 2016;31(3):363-397. Doi:10.1515/reveh-2016-0011.

B. W. G. (2012). "Bioinitiative Report 2012: A Rationale for Biologically-based Exposure Standards for Low-Intensity Electromagnetic Radiation."

[21] https://media.cadc.uscourts.gov/opinions/docs/2021/08/20-1025-1910111.pdf
[22] 47 CFR 1.1310(e)(1)(II) shows 1 mW/cm2, which is equivalent to 10 million uM/m2, https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-1/subpart-I/section-1.1310.
[23] FCC's *Guidelines for Cellular Antenna Site Calculations,* https://www.fcc.gov/consumers/guides/human-exposure-radio-frequency-fields-guidelines-cellular-and-pcs-sites#:~:text=In%201996%2C%20the%20FCC%20adopted,lower%2Dpowered%20cell%20site%20transmitters.

towers to be installed[24] just feet from a home, business or school where individuals and children are in the main transmitting beam for many hours a day.

d) The FCC's MPEL is based on IEEE (Institute of Electrical and Electronic Engineers) guidelines[25] which "have not been changed since 1991 and do not consider children."[26] Testing was performed on "a model head with dimensions based [on] the 90th percentile of U.S. military recruits in the year 1989. The corresponding body of the head would be a six foot, two inches, 220 lb. male."[27] A Specific Absorption Rate (SAR) – rate of absorption of electromagnetic radiation -- is then calculated based on thermal effects (heating tissue) of that model head.[28] However, biological effects from RF radiation are also non-thermal, documented by the studies cited herein, yet neglected in FCC testing.

e) The FCC failed to disclose that in 2019 when it tested cell phones next to the body (which is the way that the public typically uses cell phones), the cell phones exceeded the limits of RF radiation for human exposure. [29]

3. **A U.S. Naval Medical Academy Research** report from 1971 by Dr. Zory Glaser[30] linked 23 chronic diseases to RF radiation based on over 2300 studies.[31] A Feb 2025 report correlates Dr. Glaser's findings from 1971 of biological effects of RF radiation and millimeter wave (5G) technology to reported cases of chronic disease.[32] The 2025 report states that Dr. Glaser reported biological effects and diseases related to the central and autonomic nervous systems, genetic / chromosomal, vascular, blood, metabolic, endocrine and gastrointestinal disorders.[33] In 1976, Dr. Glaser updated the total bibliography to 3700 reports relating to the biological effects of RF radiation.[34]

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[24] *In re Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Inv.*, 33 F.C.C.R. 9088, 9104-05 (2018).
[25] FCC guidelines are set forth at 47 CFR 1.1310, see note at (d)(4); see also, https://www.fcc.gov/consumers/guides/human-exposure-radio-frequency-fields-guidelines-cellular-and-pcs-sites#:~:text=In%201996%2C%20the%20FCC%20adopted,lower%2Dpowered%20cell%20site%20transmitters.
[26] *The Effects of RF-EMF on the Child Brain*, Aaron Skaist, Vol 12, No. 2, 2019, at 2, The Science Journal of the Lander College of Arts and Sciences, https://touroscholar.touro.edu/cgi/viewcontent.cgi?article=1218&context=sjlcas.
[27] Ibid at 3.
[28] Ibid.
[29] https://ehtrust.org/press-release-concealed-fcc-cell-phone-radiation-tests-show-human-exposure-limits-were-exceeded/.
[30] About Dr. Zory Glaser, https://zoryglaser.com/.
[31] https://www.magdahavas.com/wp-content/uploads/2010/06/Navy_Radiowave_Brief.pdf.
[32] Report: "Safety of Wireless Radiation, a Scientific View, Feb 2025, Richard Lear and Camilla Rees, https://www.researchgate.net/publication/388763046_Safety_of_Wireless_Technologies_The_Scientific_View at 12-13.
[33] Ibid at 3.
[34] https://ehtrust.org/wp-content/uploads/Naval-MRI-Glaser-Report-1976.pdf.

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4. **A U.S. Air Force report** from 1994[35] states that "[i]t is known that electromagnetic radiation [EMR] has a biological effect on human tissue" covering a wide range including adverse cardiovascular, neurological and behavioral effects including the risk of cancer. Since 1956, the Dept. of Defense directed the Armed Forces (Army, Navy, Air Force) to study EMR. The report found that EMR can interact with human tissue's bioelectrical function and Eastern Europe and the then Soviet Union found that human tissue may be more sensitive to EMR's non-thermal effects.

5. **Central Intelligence Agency (CIA).** In 2012, the CIA declassified and approved for release a 1977 Russian study on the "Biological Effects of Millimeter Radiowaves" which found that while millimeter waves only penetrate the skin, they trigger a cascade of adverse biological effects within the body.[36]
    a) The study coins the term **"radiowave disease"** to describe these effects.[37] Adverse effects on the skin included demyelination of sections of nerve fibers (damage or destruction to the insulation around nerve fibers which disrupts normal nerve impulse transmission), fragmented neural conductors, and deformation of sensory receptors, leading to neurological disorders.
    b) The people observed working with millimeter radio wave generators had disturbances in their blood and immuno-biology.[38]
    c) Exposure in lab animals caused many disorders including of the liver, spleen, heart and brain, inhibiting "oxygen consumption rate by the mitochondria of those organs."[39]
    d) The degree of adverse effects **increased with more exposure**;[40] the lab animals had been exposed for 15 minutes a day for 60 days. It reported that when exposure ceases, disorders from low millimeter radio waves are reversible.[41] However, if adverse effects depend on duration of exposure, then Americans exposed continuously 24/7, 365 days a year, would suffer adverse biological effects, but without reprieve and without the ability to recover.

6. **Chronology of Federal Agencies** expressing since at least the 1990s that the FCC's wireless limits address only thermal (heating of human tissue), not non-thermal exposure, of RF radiation,[42] despite the fact that non-thermal exposure produces biological effects and disease, as documented herein.

Independent Research on Biological Effects of RF Radiation, Disregarded by Federal Agencies:

1. **The World Health Organization's (WHO) International EMF Project Review of April 2025** of animal studies found reliable evidence that RF radiation increases the risk of cancer.[43] This reinforces the 2018 findings of cancer from the National Toxicology Program and the Ramazzini Institute. The WHO's results may lead scientists to call for the IARC to augment its carcinogenicity classification from "possible" Class 2B in humans set in 2011 to "probable" or "known" carcinogenicity in humans in

[35] *Radiofrequency / Microwave Radiation Biological Effects and Safety Standards, a Review (1994)*, Scott Bolen, Rome Laboratory, Griffiss Air Force Base, at 1, https://youandemf.com/wp-content/uploads/2025/01/EMR-US-Military-Report.pdf.
[36] https://mdsafetech.org/wp-content/uploads/2019/02/biological-effects-of-millimeter-wavelengths.-zalyubovskaya-declassif-by-cia-1977-biol-eff-mm-waves.pdf.
[37] Ibid at 57.
[38] Ibid at 60.
[39] Ibid at 59.
[40] Ibid at 59.
[41] Ibid at 58.
[42] https://ehtrust.org/timeline-of-development-of-safety-limits-for-wireless-radiation-in-us/.
[43] https://www.sciencedirect.com/science/article/pii/S0160412025002338.

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2025.[44] The objective of the new review was to systematically evaluate the effects of RF EMF exposure on cancer.

a) **The WHO's IARC** classified EMF as a **Class 2B possible human carcinogen** in 2011[45] (similar to lead, diesel fuel and gasoline engine exhaust). This was based on "epidemiological observations in humans which exhibited higher risks for the glioma-type of malignant brain cancer and of benign vestibular schwannoma of the vestibulocochlear nerve among heavy or long-term subscribers of cell or mobile phones."[46]

b) "[R]esults from animal experiments that the IARC was lacking were later provided by the U.S. National Toxicology Program (NTP) report of two types of cancers in laboratory rats that were exposed, lifelong, to 2G and 3G cell phone RF radiation frequencies below 6 GHz . . . did not exceed 1°C,"[47] i.e., did not heat tissue.

c) Since the WHO 2011 IARC cancer finding by independent scientists, other factions within the WHO have sought to produce industry-aligned pronouncements. For example, its website states a lack of causality of harm from wireless radiation.[48] However, over a decade later, a number of the IARC scientists are saying the opposite – that radiofrequency should be upgraded to a group 1 carcinogen (the highest level of evidence).[49] Dr. Miller, a former Senior Epidemiologist and Senior Scientist at the IARC has stated, **"[t]here is sufficient evidence to now classify radiofrequency radiation as a human carcinogen."** [50] The WHO's April 2025 review reinforces that conclusion.

   i. The WHO recently commissioned a study by Karpidis, et al, which concluded in 2024 no hazards from wireless radiation,[51] however, the study has been found to be severely flawed

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[44] See, e.g., https://icbe-emf.org/who-funded-study-reports-high-certainty-of-the-evidence-linking-cell-phone-radiation-to-cancer-in-animals/.

[45] https://www.iarc.who.int/wp-content/uploads/2018/07/pr208_E.pdf.

[46] J. C. Lin, "RF Health Safety Limits and Recommendations [Health Matters]," in IEEE Microwave Magazine, vol. 24, no. 6, pp. 18-77, June 2023, doi: 10.1109/MMM.2023.3255659. keywords: {Radiation detectors;Human factors;Safety;Radiation effects;Cellular phones;Radio frequency}.

[47] J. C. Lin, "RF Health Safety Limits and Recommendations [Health Matters]," in IEEE Microwave Magazine, vol. 24, no. 6, pp. 18-77, June 2023, doi: 10.1109/MMM.2023.3255659. keywords: {Radiation detectors;Human factors;Safety;Radiation effects;Cellular phones;Radio frequency}.

[48] https://www.who.int/news-room/questions-and-answers/item/radiation-5g-mobile-networks-and-health.

[49] Hardell, L., Carlberg, M."Comments on the US National Toxicology Program technical reports on toxicology and carcinogenesis study in rats exposed to whole-body radiofrequency radiation at 900 MHz and in mice exposed to whole-body radiofrequency radiation at 1,900 MHz". International Journal of Oncology 54, no. 1 (2019): 111-127. https://doi.org/10.3892/ijo.2018.4606

[50] Professor Miller, MD, FRCP, FRCP (C), FFPH, FACE, is an eminent physician and expert in preventative medicine, a scientific advisor to various scientific and health authorities, and a former Senior Epidemiologist and Senior Scientist at the World Health Organization's (WHO) International Agency for Research on Cancer (IARC), https://phiremedical.org/2020-nir-consensus-statement-press-release/; see Prof. Miller's statement at 00:15:06 at https://www.youtube.com/watch?v=S16QI6-w9I8; see also Proceedings from a Symposium on the Impacts of Wireless Technology on Health, Prof. Miller at 8, https://www.womenscollegehospital.ca/wp-content/uploads/2022/06/Symposium_Document_Final_Jan_12.pdf.

[51] K. Karipidis, D. Baaken, T. Loney, M. Blettner, C. Brzozek, M. Elwood, C. Narh, N. Orsini, M. Röösli, M.S. Paulo, S. Lagorio, The effect of exposure to radiofrequency fields on cancer risk in the general and working population: A systematic review of human observational studies - Part I: Most researched outcomes
Environ Int., 191 (2024), Article 108983, 10.1016/j.envint.2024.108983.

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with no scientifically valid assessment,[52] and its conclusion contradicted scientific evidence and was drawn from data showing hazards.[53] Researchers have called for a retraction of the study.[54]

ii. Another WHO study in 2024 on RF-induced oxidative stress identified 11,599 studies on oxidative stress within the 800-2450 MHz range, but discarded more than 99% of those studies.[55] Researchers have called for a retraction of that study, as well.[56]

2. **The Ramazzini Institute** in Italy in 2018 found increased malignant heart schwannomas and malignant brain gliomas in lab animals from cell tower base stations, similar to what the NTP found from 2G/3G.[57]

Note: *"Since the IARC evaluation in 2011, the evidence on human cancer risks from RF radiation has been strengthened based on human cancer epidemiology reports [IARC Class 2B designation for RF radiation], animal carcinogenicity studies [NTP study finding clear evidence of cancer] and experimental findings on oxidative mechanisms [associated with increased DNA damage][58] and genotoxicity [associated with increased DNA*

[52] John W. Frank, Joel M. Moskowitz, Ronald L. Melnick, Lennart Hardell, Alasdair Philips, Paul Héroux, Elizabeth Kelley, *The Systematic Review on RF-EMF Exposure and Cancer by Karipidis et al. (2024) has Serious Flaws that Undermine the Validity of the Study's Conclusions*, Environment International, Vol. 195, 2025, 109200, ISSN 0160-4120, https://doi.org/10.1016/j.envint.2024.109200. (https://www.sciencedirect.com/science/article/pii/S0160412024007876)

[53] "WHO to build neglect of RF-EMF exposure hazards on flawed EHC reviews? Case study demonstrates how 'no hazards' conclusion is drawn from data showing hazards," 7/10/24, https://www.degruyter.com/document/doi/10.1515/reveh-2024-0089/html;
"WHO's EMF Project's Systemic Reviews on the Association between RF Exposure and Health Effects Encounter Challenges," James Lin, IEEE Microwave Magazine, Jan 2025, https://www.dropbox.com/scl/fi/xq492i5ha6f2431vyxn3g/World_Health_Organizations_EMF_Projects_Systemic_Reviews_on_the_Association_Between_RF_Exposure_and_Health_Effects_Encounter_Challenges_Health_Matters.pdf?rlkey=o77i19den485rdo2k4ktdzhgj&st=842p0rbv&dl=0.

[54] Lennart Hardell, Mona Nilsson. A Critical Analysis of the World Health Organization (WHO) Systematic Review 2024 on Radiofrequency Radiation Exposure and Cancer Risks. Journal of Cancer Science and Clinical Therapeutics. 9 (2025): 09-26., https://cdn.fortunejournals.com/articles/a-critical-analysis-of-the-world-health-organization-who-systematic-review.pdf.

[55] Frank, John W., Melnick, Ronald L. and Moskowitz, Joel M.. "A critical appraisal of the WHO 2024 systematic review of the effects of RF-EMF exposure on tinnitus, migraine/headache, and non-specific symptoms" Reviews on Environmental Health, 2024. https://doi.org/10.1515/reveh-2024-0069; "Another WHO RF Review Challenged, More than 99% of Studies on Oxidative Stress Discarded," Microwave News, 8/21/24, https://www.microwavenews.com/short-takes-archive/another-who-rf-systematic-review-challenged.

[56] Ibid.

[57] https://pubmed.ncbi.nlm.nih.gov/29530389/; see also J. C. Lin, "RF Health Safety Limits and Recommendations [Health Matters]," in IEEE Microwave Magazine, vol. 24, no. 6, pp. 18-77, June 2023, doi: 10.1109/MMM.2023.3255659. keywords: {Radiation detectors;Human factors;Safety;Radiation effects;Cellular phones;Radio frequency}.

[58] Yakymenko I, Tsybulin O, Sidorik E, Henshel D, Kyrylenko O, Kyrylenko S. Oxidative mechanisms of biological activity of low-intensity radiofrequency radiation. Electromagn Biol Med. 2016;35:186–202. doi: 10.3109/15368378.2015.1043557.

damage][59]. Therefore, the IARC Category should be upgraded from Group 2B to Group 1, a human carcinogen[60].” [61] *[Some internal footnotes omitted]*

3. **International Commission on the Biological Effects of Electromagnetic Fields (ICBE-EMF).** “Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation: implications for 5G.”[62]

    a) The FCC wireless radiation limits for human exposure are based **largely** on 1980s experiments “**involving 40-60 minute exposures in 5 monkeys and 8 rats**, and then applying arbitrary safety factors to an apparent threshold specific absorption rate (SAR) of 4 W/kg . . . Adverse effects observed at exposures below the assumed threshold SAR include non-thermal induction of reactive oxygen species, DNA damage, cardiomyopathy, carcinogenicity, sperm damage, and neurological effects . . . “[63]

4. **Panagopoulos, et al, *Review on human-made EMF’s ion forced-oscillation and voltage-gated ion channel dysfunction, oxidative stress and DNA damage (2021)*.** “[E]xtremely low frequency (ELF) band, and the microwave/radio frequency (RF) band which is always combined with ELF, may lead to DNA damage [which is] connected with cell death, infertility and other pathologies, including cancer.”[64]

5. **New Hampshire Commission** studied the biological effects of wireless radiation and issued a report Nov. 2020[65] with former commissioner Dr. Kent Chamberlain explaining a “key finding being that exposure to wireless communication radiation is harmful to the health of humans and the environment. Those findings apply to all forms of wireless radiation, which include all generations of cellphone radiation.” (see Appendix A, Dr. Chamberlin’s letter explaining their findings).

6. **Thousands of scientific and medical studies** show neurological disorders; increased risk of cancer[66] and brain tumors; DNA damage; oxidative stress; immune dysfunction; cognitive processing effects; altered brain development, sleep and memory disturbances, ADHD, abnormal behavior, sperm dysfunction, and damage to the blood-brain barrier.[67]

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[59] Smith-Roe SL, Wyde ME, Stout MD, Winters JW, Hobbs CA, Shepard KG, Green AS, Kissling GE, Shockley KR, Tice RR, et al. Evaluation of the genotoxicity of cell phone radiofrequency radiation in male and female rats and mice following subchronic exposure. Environ Mol Mutagen. 2020;61:276–290. doi: 10.1002/em.22343.

[60] Carlberg M, Hardell L. Evaluation of mobile phone and cordless phone use and glioma risk using the Bradford Hill viewpoints from 1965 on association or causation. BioMed Res Int. 2017;2017:9218486. doi: 10.1155/2017/9218486.

[61] Health risks from radiofrequency radiation, including 5G, should be assessed by experts with no conflicts of interest, LHardell, MCarlberg, Oncol Lett. 2020 Jul 15;20(4):15. doi: 10.3892/ol.2020.11876.

[62] EnvironHealth 21, 92 (2022). https://doi.org/10.1186/s12940-022-00900-9.

[63] Ibid.

[64] https://pmc.ncbi.nlm.nih.gov/articles/PMC8562392/Dr. Dimitris J. Panagopoulos is an EMF-biophysicist at the Choremeion Research Laboratory, Medical School, University of Athens, Greece, https://www.researchgate.net/profile/Dimitris-Panagopoulos-3.

[65] http://www.gencourt.state.nh.us/statstudcomm/committees/1474/reports/5G%20final%20report.pdf.

[66] *Mobile phone radiation causes brain tumors and should be classified as a probable human carcinogen (Review),* Journal of Oncology, https://www.spandidos-publications.com/10.3892/ijo.2015.2908.

[67] A Rationale for Biologically-based Exposure Standards for Low-Intensity Electromagnetic Radiation, 2022, https://bioinitiative.org/conclusions/; see also, Adverse health effects of 5G mobile networking technology under real-life conditions, May 1, 2020, https://pubmed.ncbi.nlm.nih.gov/31991167/; Wireless Radiation (RFR) – Is U.S. Government Ignoring Its Own Evidence for Risk? March, 28, 2019, https://electromagnetichealth.org/electromagnetic-health-blog/u-s-gov-ignoring-own-evidence/; Oxidative Mechanisms of Biological Activity of Low-Intensity Radiofrequency Radiation,

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7. **Eight case studies** since Jan 2023 in Sweden show adverse health impacts from exposure to 5G towers. Previously healthy individuals developed typical "microwave syndrome" symptoms shortly after the towers were installed: headaches, abnormal fatigue, heart arrythmia, burning skin, trouble concentrating.[68] The significance of these reports is that non-ionizing radiation[69] from 5G — well below levels allowed by authorities — can cause health problems in individuals who had no prior history of electromagnetic sensitivity.[70] Dr. Lennart Hardell, lead author of the reports and world-renowned scientist on cancer risks from radiation, affirms these reports as "groundbreaking" because they serve as the "first warning of a health hazard."[71]

8. **One-third of Americans suffer from symptoms from RF radiation**, based on a 2019 Bevington study which analyzed the prevalence of symptoms from RF radiation within any given population. [72] Based on a population of 332.4 million people in the U.S.,[73] 120 million have symptoms, 2% of which (7 million) have severe symptoms or can't work.

9. **The Bioinitiative Report's** review of 1800 studies found biological effects of RF radiation which can occur within minutes of exposure,[74] and recommends no more than 0.1 microwatts per centimeter squared for human exposure[75] (compared to the FCC's MPEL of 580 microwatts per centimeter squared). Chronic or prolonged exposure to cell towers can result in biological effects; RF radiation exposures "prevent the body from healing damaged DNA, produce immune system imbalances,

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Electromagnetic Biology and Medicine, 35(2), 186-202, Yakymenko, I., Tsybulin, O., Sidorik, E., Henshel, D., Kyrylenko, O., & Kyrylenko, S. (2016), https://pubmed.ncbi.nlm.nih.gov/26151230/.

[68] https://mdsafetech.org/2023/11/20/5g-health-effects-5-case-reports-of-health-symptoms-after-5g-cell-towers-placed-in-sweden/; e.g., Jan 2023 study of 63 year old man and 62 year old woman where 5G antennas were installed on the rooftop of their home, https://www.gavinpublishers.com/assets/articles_pdf/Case-Report-The-Microwave-Syndrome-after--Installation-of-5G-Emphasizes-the-Need-for--Protection-from-Radiofrequency-Radiation.pdf and https://childrenshealthdefense.org/defender/5g-radiation-microwave-syndrome-symptoms/; Feb 2023 study of two previously healthy men where 5G antennas were installed on the rooftop of their business, https://www.anncaserep.com/open-access/development-of-the-microwave-syndrome-in-two-men-shortly-after-9589.pdf; April 2023 study of 52 year old woman whose apartment was 60 meters from a 5G base station, https://acmcasereport.com/pdf/ACMCR-v10-1926.pdf?fbclid=IwAR2J-mE3XeBxqaXPQdFxslf9Q23bMCer9vgUBHnCvJXBrgBv-w7YdRUDwF0; see also, "The microwave syndrome or electro-hypersensitivity: historical background," https://pubmed.ncbi.nlm.nih.gov/26556835/.

[69] https://childrenshealthdefense.org/emr/emf-key-terms-descriptions/.

[70] https://childrenshealthdefense.org/emr/emf-wireless-health-impacts/.

[71] https://www.stralskyddsstiftelsen.se/two-studies-show-that-5g-caused-the-microwave-syndrome-in-healthy-persons/.

[72] "The Prevalence of People with Restricted Access to Work in Manmade Electromagnetic Environments," Journal of Environment and Health Science, https://mdsafetech.files.wordpress.com/2019/10/2018-prevalence-of-electromagnetic-sensitivity.pdf.

[73] https://www.commerce.gov/news/blog/2022/01/us-population-estimated-332403650-jan-1-2022#:~:text=As%20our%20nation%20prepares%20to,since%20New%20Year's%20Day%202021.

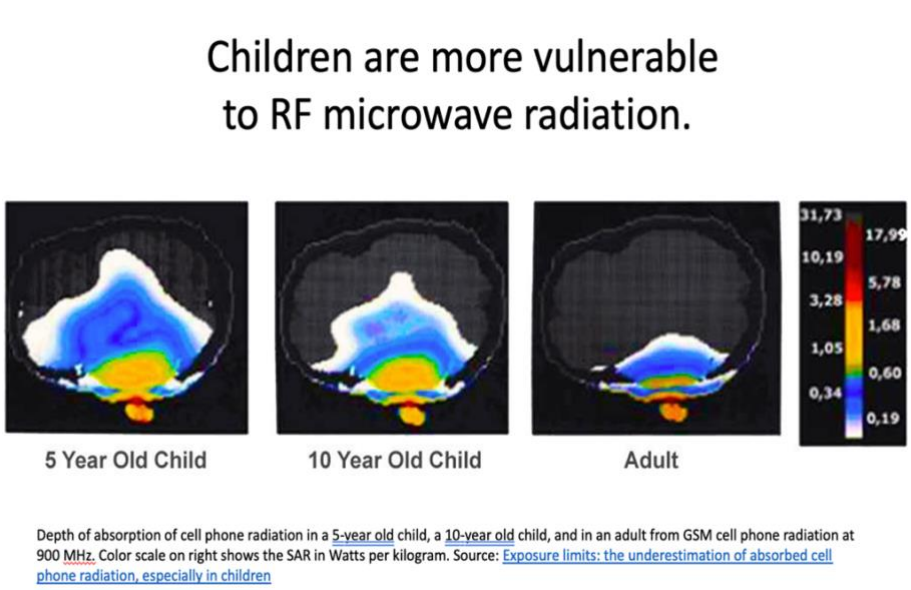
[74] *Key Scientific Evidence and Public Health Policy Recommendations*, Supplement 2012, at 4, David O. Carpenter, MD, Director, Institute for Health and the Environment University at Albany, Cindy Sage, MA, Sage Associates, https://bioinitiative.org/wp-content/uploads/pdfs/sec24_2012_Key_Scientific_Studies.pdf.https://bioinitiative.org/; see also, BioInitiative 2012 Conclusions, https://bioinitiative.org/conclusions/.

[75] *Key Scientific Evidence and Public Health Policy Recommendations* 2007, at 22-23, https://bioinitiative.org/wp-content/uploads/pdfs/sec24_2007_Key_Scientific_Studies.pdf.

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metabolic disruption . . . lower resistance to disease . . . pervasive impairment of metabolic and reproductive functions."[76]

10. **Children absorb more RF radiation and are at greater risk than adults**.[77]
    a) **From cell phones:**[78]



Depth of absorption of cell phone radiation in a 5-year old child, a 10-year old child, and in an adult from GSM cell phone radiation at 900 MHz. Color scale on right shows the SAR in Watts per kilogram. Source: Exposure limits: the underestimation of absorbed cell phone radiation, especially in children

    b) **American Academy of Pediatrics:** children are disproportionately affected by cell phone radiation due to their lower bone density and amount of fluid in the brain allowing for absorption of greater quantities of RF radiation than in adults.[79]

    c) **Greater risk for fetuses:** risk of "degeneration of the protective myelin sheath that surrounds brain neurons."[80]

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[76] *Key Scientific Evidence and Public Health Policy Recommendations*, Supplement 2012, at 4, https://bioinitiative.org/wp-content/uploads/pdfs/sec24_2012_Key_Scientific_Studies.pdf.https://bioinitiative.org/; see also, BioInitiative 2012 Conclusions, https://bioinitiative.org/conclusions/.

[77] Wireless technologies, non-ionizing electromagnetic fields and children: Identifying and reducing health risks," Devra Davis PhD, MPH, Linda Birnbaum PhD, Paul Ben-Ishai PhD, Hugh Taylor MD, Meg Sears MEng, PhD, Tom Butler PhD, MSc, Theodora Scarato MSW, bCurr Probl Pediatr Adolesc Health Care, 2023 Feb;53(2):101374 https://doi.org/10/1016/j.cppeds.2023.101374; see also, *Children and Wireless Radiation,* https://ehtrust.org/educate-yourself/children-and-wireless-faqs/.

[78] Exposure limits: the underestimation of absorbed cell phone radiation, especially in children, Gandhi, Morgan, Augusto de Salles, Han, Heberman, Davis, October 14, 2011, https://pubmed.ncbi.nlm.nih.gov/21999884/.

[79] *Key Scientific Evidence and Public Health Policy Recommendations*, Supplement 2012, at 21, David O. Carpenter, MD, Director, Institute for Health and the Environment University at Albany, Cindy Sage, MA, Sage Associates, https://bioinitiative.org/wp-content/uploads/pdfs/sec24_2012_Key_Scientific_Studies.pdf.https://bioinitiative.org/.

[80] *Why children absorb more microwave radiation than adults: The consequences,* Morgan, Kesar and Davis, Journal of Microscopy and Ultrastructure, Vol. 2, Issue 4, December 2014, 197-204, https://www.sciencedirect.com/science/article/pii/S2213879X14000583.

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d) **School-age children:** risk of "[d]igital dementia."[81]

e) **Childhood leukemia**, increased risk**.**[82]

f) **Potential dangers of cell towers near schools.**[83]

i. **Elementary school children** exposed to high RF radiation from mobile phone base stations 200 meters from their schools "had a significantly higher risk of type 2 diabetes mellitus" than those exposed to lower RF radiation.[84]

ii. **Adolescent school children** exposed to high RF radiation from mobile phone base stations within 200 meters from their schools had "delayed fine and gross motor skills, spatial working memory and attention" than those exposed to lower RF radiation.[85]

iii. **A ten-year old child** testified of his cardiac condition being caused by exposure to RF radiation from a router in the library where he was being tutored.[86]

11. **Neurobehavioral Symptoms Near Cell Towers.** The following chart shows a worsening of symptoms when closer to a cell tower but a lessening of symptoms when farther away from a cell tower.[87]

[81] *Why children absorb more microwave radiation than adults: The consequences,* Morgan, Kesar and Davis, Journal of Microscopy and Ultrastructure, Vol. 2, Issue 4, December 2014, 197-204, https://www.sciencedirect.com/science/article/pii/S2213879X14000583.

[82] *Key Scientific Evidence and Public Health Policy Recommendations*, 2007, at 19, David O. Carpenter, MD, Director, Institute for Health and the Environment University at Albany, Cindy Sage, MA, Sage Associates, https://bioinitiative.org/wp-content/uploads/pdfs/sec24_2007_Key_Scientific_Studies.pdf.

[83] Dr. Magda Havas: WiFi in Schools is Safe. True or False? https://www.youtube.com/watch?v=6v75sKAUFdc.

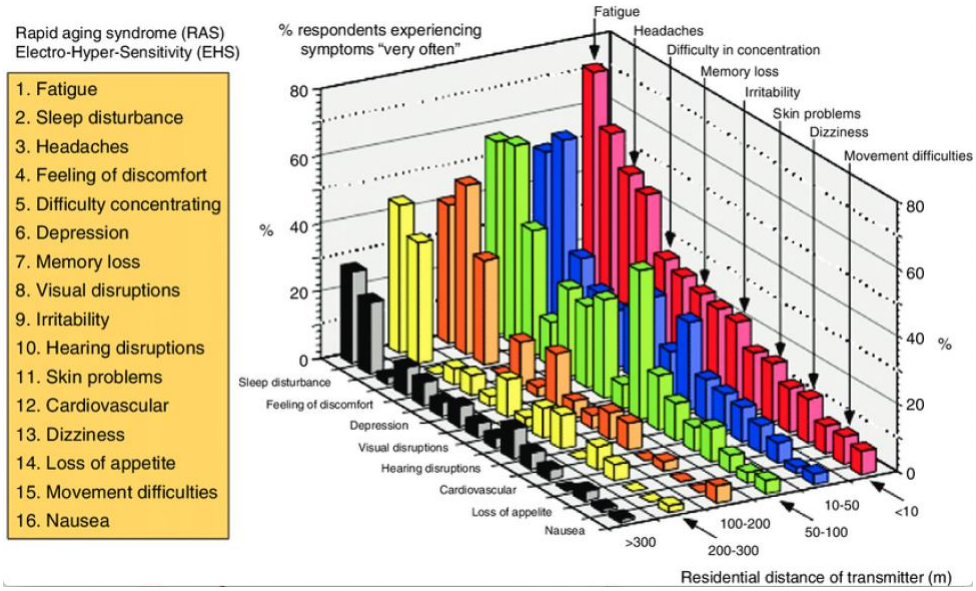
[84] *Association of Exposure to Radio-Frequency Electromagnetic Field Radiation (RF-EMFR) Generated by Mobile Phone Base Stations (MPBS)with Glycated Hemoglobin (HbA1c) and Risk of Type 2 Diabetes Mellitus*, Sultan Ayoub Meo et al, International Journal of Environmental Research and Public Health, 2015; https://www.researchgate.net/publication/283726472_Association_of_Exposure_to_Radio-Frequency_Electromagnetic_Field_Radiation_RF-EMFR_Generated_by_Mobile_Phone_Base_Stations_with_Glycated_Hemoglobin_HbA1c_and_Risk_of_Type_2_Diabetes_Mellitus.

[85] Meo, S. A., Almahmoud, M., Alsultan, Q., Alotaibi, N., Alnajashi, I., & Hajjar, W. M. (2018). *Mobile Phone Base Station Tower Settings Adjacent to School Buildings: Impact on Students' Cognitive Health*, American Journal of Men's Health; https://pubmed.ncbi.nlm.nih.gov/30526242/.

[86] Child With Heart Problems From Wireless: 5G Health Risks California SB 649 Hearing, https://www.youtube.com/watch?v=OgNLR9fQOX4&list=PLT6DbkXhTGoDakSqp1i_7milpwGx4xMFq.

[87] *Cell Tower Health Effects*, Physicians for Safe Technology, https://mdsafetech.org/cell-tower-health-effects/.

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Symptoms experienced by people near cellular phone base stations; RF radiation affects the blood, heart and autonomic nervous system.[88] Source: Santini, et al (France): Pathol Biol. 2002;50:S369-73; Dr. Magda Havas, PhD.

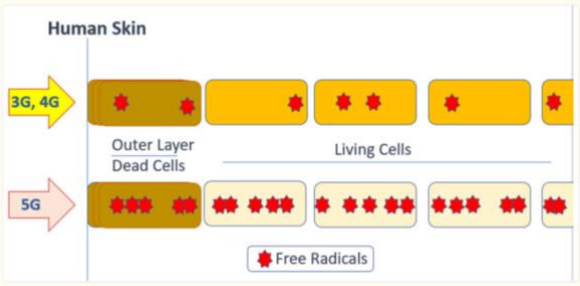
12. **RF Radiation Effects.** A group of toxicology researchers from multiple universities concluded that overall, high frequency RF radiation even below the FCC limits "can result in: carcinogenicity (brain tumors/glioma, breast cancer, acoustic neuromas, leukemia, parotid gland tumors), genotoxicity (DNA damage, DNA repair inhibition, chromatin structure), mutagenicity, teratogenicity, neurodegenerative diseases (Alzheimer's Disease, Amyotrophic Lateral Sclerosis), neurobehavioral problems, autism, reproductive problems, pregnancy outcomes, excessive reactive oxygen species/oxidative stress, inflammation, apoptosis, blood-brain barrier disruption, pineal gland/melatonin production, sleep disturbance, headache, irritability, fatigue, concentration difficulties, depression, dizziness, tinnitus, burning and flushed skin, digestive disturbance, tremor, cardiac irregularities, adverse impacts on the neural, circulatory, immune, endocrine, and skeletal systems" and "from this perspective, **RF is a highly pervasive cause of disease**." [89]

13. **5G's Biological Effects.** Contrary to claims that 5G's higher frequencies (millimeter waves) simply "bounce" off the skin, researchers have documented that the coiled portion of the skin's sweat duct can be regarded as a helical antenna in the sub-THz band and the skin, our largest organ, can intensely absorb the higher 5G frequencies.[90] The millimeter wave technology of 5G will not only directly and adversely affect the skin and eyes [e.g., skin cancer, cataracts], but will, in turn, cascade into systemic signaling effects within the body, "on the nervous system, heart and immune system."[91] The free

[88] Dr. Magda Havas, https://www.researchgate.net/figure/Symptoms-experienced-by-people-near-cellular-phone-base-stations-based-on-the-work-of_fig2_258313941.
[89] Ronald N. Kostoff, Paul Heroux, Michael Aschner, Aristides Tsatsakis, "Adverse health effects of 5G mobile networking technology under real-life conditions," Toxicology Letters, Vol 323, 2020, pp. 35-40, ISSN 0378-4274, https://doi.org/10.1016/j.toxlet.2020.01.020.
[90] N. Betzalel, Y. Feldman and P. B. Ishai, "The Modeling of the Absorbance of Sub-THz Radiation by Human Skin," in IEEE Transactions on Terahertz Science and Technology, vol. 7, no. 5, pp. 521-528, Sept. 2017, doi: 10.1109/TTHZ.2017.2736345, https://ieeexplore.ieee.org/document/8016593.
[91] Ronald N. Kostoff, Paul Heroux, Michael Aschner, Aristides Tsatsakis, "Adverse health effects of 5G mobile networking technology under real-life conditions," Toxicology Letters, Vol 323, 2020, pp. 35-40, ISSN 0378-4274,

radicals accumulating on the skin from 5G (see figure below) cause oxidative stress which can lead to DNA strand breaks, cancer and atherosclerosis.[92]

Figure 1.



14. **Clumping of blood cells.** A Feb 2025 study found that when an otherwise healthy person is in close proximity to a cell phone red blood cells clumped together (rouleaux formation), which leads to blood abnormality, less oxygen transport, and potentially blockages, stroke and heart problems.[93]

15. **"The 5G Appeal"** to the United Nations to halt the proliferation of 5G, warning of potential biological effects, was signed by 252 scientists and professionals from 43 countries, 40 scientists of which are from 15 U.S. states, including scientists and medical professionals from Columbia and Harvard.[94] Other scientists have joined in consensus statements.[95]

16. **International Association of Fire Fighters** passed a resolution in 2004 that disapproved of cell towers on or near fire stations until safety can be proven.[96]

17. **Increases in brain cancer** in the U.S. have been reported, with scientists attributing a high probability on RF radiation from cell phone use.[97]

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https://doi.org/10.1016/j.toxlet.2020.01.020; J J B, A R M, S M J M. A New Look at Three Potential Mechanisms Proposed for the Carcinogenesis of 5G Radiation. J Biomed Phys Eng. 2020 Dec 1;10(6):675-678. doi: 10.31661/jbpe.v0i0.2008-1157. PMID: 33364204; PMCID: PMC7753259, https://pmc.ncbi.nlm.nih.gov/articles/PMC7753259/#ref7.

[92] J J B, A R M, S M J M. A New Look at Three Potential Mechanisms Proposed for the Carcinogenesis of 5G Radiation. J Biomed Phys Eng. 2020 Dec 1;10(6):675-678. doi: 10.31661/jbpe.v0i0.2008-1157. PMID: 33364204; PMCID: PMC7753259, https://pmc.ncbi.nlm.nih.gov/articles/PMC7753259/#ref7; Russell C L. 5 G wireless telecommunications expansion: Public health and environmental implications. EnvironMental Research. 2018;165:484–95. doi: 10.1016/j.envres.2018.01.016.

[93] "Hypothesis: ultrasonography can document dynamic in vivo rouleaux formation due to mobile phone exposure," Robert R. Brown, Barbara Biebrich, Front. Cardiovasc. Med. , 10 February 2025 Sec. Atherosclerosis and Vascular Medicine, Volume 12 - 2025 | https://doi.org/10.3389/fcvm.2025.1499499; see also, https://ehtrust.org/cellphones-and-your-blood-what-you-need-to-know/.

[94] http://www.5gappeal.eu/the-5g-appeal/; see also, Dr. Martin Blank, PhD, Dept of Physiology and Cellular Biophysics, Columbia University, announcing the appeal early on and warning on wireless radiation, https://www.youtube.com/watch?v=HgECRrabuZQ; see also, https://childrenshealthdefense.org/defender/5g-rollout-harm-regulation-profit/.

[95] https://phiremedical.org/wp-content/uploads/2020/11/2020-Non-Ionising-Radiation-Consensus-Statement.pdf.

[96] https://www.iaff.org/cell-tower-radiation/.

[97] See, e.g., Brain Tumor Rates Are Rising in the US: The Role of Cellphone & Cordless Phone Use; The Incidence of Meningioma, a Non-Malignant Brain Tumor, is Increasing in the U.S.; New review study finds that heavier cell phone use increases tumor risk; Expert report by former U.S. govt. official: High probability RF radiation causes brain tumors; Cell phone and cordless phone use causes brain cancer: New review; and https://ehtrust.org/scientific-documentation-cell-phone-radiation-associated-brain-tumor-rates-rising/.

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18. **Comprehensive overview** of the adverse biological effects on people and the environment is provided at https://ehtrust.org/wp-content/uploads/EHT-5G-Health-and-Environment-Open-Letter-3_2021-3.pdf.

Chronic Disease and Clusters Near Cell Towers

1. **Near Duluth, MN**, a woman suffered 51 strokes after a nearby cell tower was "upgraded," in addition to experiencing nausea, blind spots in her vision, orientation and balance difficulties.[98]

2. **Clusters of sickness near cell towers (not exhaustive).**

   a. **The Board of Health of Pittsfield, MA** issued an emergency cease and desist order in April 2022 to turn off a 4G cell tower that injured 17 residents, most of whom evacuated their homes.[99] One of those who remained has since died of cancer. The order cited residents having reported "headaches, ringing in the ears, dizziness, heart palpitations, nausea, and skin rashes," and, e.g., a child who had "to sleep with a bucket next to her bed in case she needs to throw up."[100] Because the telecom carrier threatened to sue, the Board of Health was compelled to rescind the order. The residents filed suit against the city but lost on federal preemption, i.e., no legal recourse for health claims.

   b. **In Ripon, CA** when a cell tower was placed near an elementary school, 4 children (ages 6-11) got cancer (brain, liver, kidney) and 4 teachers got breast cancer.[101] One of the children who contracted brain cancer (glioblastoma) when he was 10 years died in Aug 2024.[102] After the 4th student was diagnosed with cancer, the tower was removed.[103] Since the tower was removed, it was reported that there were no more instances of cancer at the school.[104]

   c. **In an Idaho town** after 5G cell towers were installed, it was reported that a cluster of residents developed atrial fibrillation (a-fib). One of those residents who had undergone surgery for a-fib is a plaintiff in a lawsuit against the telecom carrier which refuses to provide accommodation under the Americans with Disabilities Act.[105]

[98] https://childrenshealthdefense.org/defender/marcia-haller-cell-tower-rf-radiation-sickness/.
[99] https://ehtrust.org/cease-and-desist-order-against-verizon-cell-tower-by-board-of-health-pittsfield-ma/, see below the fold for link to the Order, p.12.
[100] https://ehtrust.org/family-injured-by-cell-tower-radiation-in-pittsfield-massachusetts/.
[101] See beginning of video at https://www.youtube.com/watch?v=-9TMTexPb_0&t=128s .
[102] See the lists of treatments and surgeries that this child endured before he died, https://www.gofundme.com/f/support-the-ferrulli-family-in-memory-of-mason.
[103] https://mdsafetech.org/2019/03/25/cell-tower-to-be-removed-after-4th-ripon-student-diagnosed-with-cancer/.
[104] See beginning of video at https://www.youtube.com/watch?v=-9TMTexPb_0&t=128s .
[105] https://childrenshealthdefense.org/press-release/chd-files-in-series-of-lawsuits-seeking-disability-accommodation-for-people-injured-by-rf-radiation-from-cell-towers/ and https://childrenshealthdefense.org/defender/henry-hank-allen-chd-verizon-lawsuit-radiofrequency-radiation-cell-towers/.

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APPENDIX A

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February 13, 2023

Queens Community Board No. 12
90-28 161st Street
Jamaica, New York 11432

Dear Community Board Members:

I am writing you as a former member of the New Hampshire State Commission that was tasked with exploring the Environmental and Health Effects of Evolving Wireless and 5G Technology. This Commission was formed through bipartisan legislation and was supported by the governor. The Commission was comprised of unbiased experts in fields relating to health and radiation and were highly qualified to evaluate the issue in a fair and in-depth manner. The Commission submitted its final report in November 2020, with a key finding being that exposure to wireless communication radiation is harmful to the health of humans and the environment. Those findings apply to all forms of wireless radiation, which include all generations of cellphone radiation.

My purpose in writing is to alert you to the dangers of siting a cell tower near to where people, particularly young people, live, work or recreate. I provide relevant details about the New Hampshire Commission's findings on this issue in a presentation I gave to the Lenox, MA Board of Health. Please know that the International Association of Fire Fighters (IAFF) in 2004 adopted a position statement still in effect today forbidding wireless communication facilities on or near fire stations as firefighters were being injured by the radiation. Many of the firefighters exposed to the wireless radiation could not remember where they were going during emergencies, nor how to administer CPR. As Dr. Gunnar Heuser indicates at the EMF Medical Conference, functional MRIs showed damage to the gray matter of their brains from the radiofrequency radiation exposure.

Scientists, physicians, environmental and public health physicians, epidemiologists, pediatricians along with engineers such as myself have been calling for state and local governments to be proactive in protecting your citizens against radiation exposure. I realize that providing such protection may seem challenging. However, initiatives such as the New Hampshire Commission and the successful lawsuit brought about by the Environmental Health Trust and others are exposing the dubious claims by the FCC

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that wireless radiation is harmless. Given the mounting evidence regarding the clear harm of radiation, it is only a matter of time before meaningful protective regulations are put in place.

While telecom companies currently have the upper hand in that they seem to be able to force communities to accept whatever tower sites they mandate, there are actions that those communities can take to delay or stop installations where people will be excessively exposed. For example, citizens in York, Maine have delayed the installation of antennas positioned close to a neighborhood. The Board of Health in Pittsfield, Massachusetts issued a cease-and-desist order against Version regarding a cell tower that was causing illness in a surrounding neighborhood. There are many other examples where citizens and administrators have worked together to protect people against cell tower radiation. Those examples can be used to strengthen your ordinances to help protect against inappropriate cell tower siting.

I am currently working with my state legislators to pass legislation that would provide protections against excessive radiation exposure. The original legislation called for a 1,640-foot setback for all new cell towers; this setback is one of the recommendations made by the New Hampshire Commission, and the rationale for picking that distance is explained here. The legislation is currently being revised so that it can be acted on in the next legislative session.

Wireless radiation dangers are real, and they can be significant in their impact on human health and the environment. I encourage you to do whatever is within your power to protect your constituents against it.

Sincerely,

Kent Chamberlin, PhD
Professor & Chair Emeritus
Fulbright Distinguished Chair

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U.S. policy on wireless technologies and public health protection: regulatory gaps and proposed reforms

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The current U.S. regulatory framework governing non-ionizing radiofrequency radiation (RFR) used in all wireless technology is outdated and lacks adequate protection, oversight, and enforcement. The U.S. Federal Communications Commission (FCC) was given regulatory jurisdiction by the U.S. Congress in 1996 over RFR exposure standards setting even though FCC has no in-house expertise regarding health or environmental effects from RFR. FCC is a licensing/engineering entity that relies on other government agencies for guidance on ambient exposures and devices. However, all relevant civilian public health and environmental agencies have been defunded from non-ionizing radiation research activities and oversight. Thus, current regulations have remained unchanged since 1996. Human exposure limits are designed to protect against short-term high-intensity effects, not today's long-term chronic low-intensity exposures. Scientific evidence indicates that children's thinner skulls, unique physiology, and more conductive tissues result in significantly higher RFR absorption rates deeper into critical brain regions, which are still in development and thus more sensitive to environmental insults. However, current policies offer no safeguards for children/pregnancy or vulnerable populations. Growing research also indicates risks to wildlife, especially pollinators. In 2021, a U.S. federal court mandated that the FCC show proper review of growing scientific evidence, after a cursory FCC re-approval of limits in 2019, but FCC has yet to respond. This paper explores regulatory infrastructure deficiencies, including the absence of monitoring/oversight, premarket safety testing, post-market surveillance, emissions compliance/enforcement, occupational safety, and wildlife protection. Compliance tests for cell phones do not reflect real-world consumer use and can therefore camouflage exposures that exceed even FCC's outdated limits. Other countries enforce stricter limits, robust monitoring, transparency measures, and compliance programs with additional policies to protect children. Also discussed is the chronic revolving door between FCC leadership and the wireless industry, resulting in a state of regulatory capture. Policy recommendations for common-sense reforms are made for reinvigorating independent research, developing science-based safety limits, ensuring pre- and post-market surveillance, and improving oversight/enforcement, as well as implementing risk mitigation to reduce exposures to children, vulnerable groups, and wildlife.

KEYWORDS

radio-frequency, electromagnetic fields, Federal Communications Commission, ICNIRP, wireless technology, non-ionizing, cell tower, cell phone

Introduction

Wireless communication is now ubiquitous in our homes, schools, workplaces, and the ambient environment, leading to increased daily exposures to non-ionizing electromagnetic fields (EMF) across all age groups, starting before birth (1–3). All wireless technologies create non-ionizing EMF exposures that are not naturally occurring on Earth (2). Unlike natural EMFs such as the sun and the Earth's geomagnetic fields, with which humans and all living things evolved, anthropogenic wireless signals are complex (4). A radiofrequency (RF) carrier wave is pulsed and modulated to transfer data (video, voice, etc.), creating polarized and highly variable, intermittent signals with lower frequency (ELF/ULF/VLF) intensity variations (3, 5, 6). Environmental levels have increased over the last century, and recent telecommunication upgrades to broadband create a wide swath of simultaneous exposures to multiple modulated frequencies (3). Recent publications emphasize how the complex signaling characteristics (e.g., modulations) of a wireless signal, alongside various environmental and biological parameters, are key to biological impacts (3, 4, 6–8). Most of these factors, however, are overlooked in existing regulations, which focus solely on the carrier wave frequency and power density (8, 9).

For decades, the prevailing assumption underpinning current human exposure guidelines is that because wireless technologies are non-ionizing and lack sufficient energy to break chemical bonds or directly damage DNA, they can only produce harmful effects through heating (thermal) mechanisms (10). This assumption is the basis for the exposure limits of the U.S. Federal Communications Commission (FCC), as well as the Institute of Electrical and Electronics Engineers (IEEE) and the International Commission on Non-Ionizing Radiation Protection (ICNIRP) (10–12). However, this assumption has been roundly challenged by scientific groups such as the International Commission on Biological Effects of Electromagnetic Fields (ICBE-EMF) and others, which argue the ionizing/non-ionizing dichotomy is outdated as adverse biological effects from low-intensity exposures are now well documented (8, 10, 13–19). They conclude that the exposure limits set by the FCC, IEEE and ICNIRP are unable to adequately protect since they are only designed to address the effects of heating from short-term high-intensity exposures, but not for the effects of long-term low-intensity cumulative exposures (8, 10, 13–19).

Numerous studies have reported increased cancer (20–23) and oxidative stress (8, 24, 25) along with genetic (26–28), epigenetic (29–31), reproductive (32–35), endocrine (36, 37), and nervous system (38–42) impacts at exposure levels below the FCC and ICNIRPs heat-based threshold of harm (43–45). Multifrequency (46, 47) and synergistic or combination effects with other environmental exposures, ionizing radiation, chemicals, drugs, and metals have also been reported (48–54). While the FCC, ICNIRP, and IEEE discount EMF non-thermal effects as not established, non-ionizing frequencies are increasingly researched/used in medical applications specifically because of their non-heating effects (55–63).

Furthermore, despite the widespread use of wireless devices by children, FCC limits and test procedures are based on a model of a 220-pound adult male (19, 64), disregarding the unique anatomical and physiological characteristics of children and the developing fetus as well as the increased sensitivity of their rapidly developing brains and bodily systems (19, 65–67). Engineering studies have demonstrated that children's thinner skulls, distinctive physiologies, and more conductive brain tissue result in significantly higher RFR absorption rates, especially in brain regions critical for memory and learning, such as the cerebellum and hippocampus (68–70).

This paper examines the current regulatory framework governing wireless and health, asking:

- What are the standards and guidelines on which FCC regulations are based?
- How did U.S. federal agencies develop the current RFR limit?
- What are the current EMF bioeffect research activities of relevant U.S. federal agencies?
- How have laws and legal decisions shaped governments' response to possible public health impacts?
- Do current practices and agency activities ensure adequate oversight and protection?
- How does the US policy approach compare to other countries?
- Is there evidence of regulatory capture?
- What reforms are needed to address regulatory gaps?

What are the standards and guidelines on which FCC regulations are based?

FCC human exposure limits for RFR are referred to as thermal limits because they are designed primarily to address the effects of heating. The origin of U.S. thermally based limits dates to Cold War era military research prompted by the development of radar and wireless technologies in WWII (71). In 1953, the Naval Research Laboratory was tasked to investigate radar health effects after the widespread circulation of a Hughes Aircraft Corporation Report by John T. McLaughlin, MD, documenting his observations of cancers, purpura, internal bleeding and other health issues in addition to a "…universal complaint of headaches by personnel working in the vicinity of microwave radiation." [(72), p. 336]. The report prompted the U.S. Air Research and Development Command and the Navy to convene a series of meetings in which a limit was ultimately adopted based on a calculation by Dr. Herman P. Schwan, a German biophysicist at the University of Pennsylvania who had long worked on the electrical properties of biological materials had come to America under Project Paperclip, a program that brought former German scientists to the U.S. after WWII (71, 73). Schwan recommended 10 mW/cm^2 (0.01 W/cm^2) as the critical exposure level based on theoretical calculations of how much heat the body could tolerate and dissipate without significantly increasing body temperature. This threshold was not informed by epidemiological or experimental data regarding health impacts or disease risk. Schwan's limit and the assumptions behind it became the foundation for most subsequent Western standards, including today's FCC limits.

From 1957 to 1960, the Tri-Service Electromagnetic Radiation Bioeffects Program, a joint initiative of the U.S. Air Force, Navy, and Army, conducted an extensive 4-year research effort aimed at

investigating microwave health effects (71, 74). Most experiments were of short duration with high intensities (not long-term, low-intensity), observing impacts above 100 mW/cm^{2,} confirming the view that non-thermal effects did not exist (72). A safety factor of 10 was incorporated, notably more lenient than the 100- and 1,000-factor safety margins proposed by General Electric and Bell Labs, respectively (75, 76), resulting in a match to Schwan's original recommendation. Although Colonel George M. Knauf, scientific coordinator at the Air Force Rome Air Development Center, stated that the limit had "been arbitrarily established," [(77), p. 36], he resisted suggestions to use a more stringent limit and concluded that the subsequent Tri-Service research did not "…shake our faith in the validity of this arbitrary level" [(71), p. 1233]. In 1962, Schwan became chair of the United States of America Standards Institute, precursor to the American National Standards Institute (ANSI), C95.1 committee, and proposed that they issue his recommended 10 mW/cm^2 limit, which they ultimately did in 1966 (71, 78).

Although the 1966 limit was not a formal federal standard, the limit and its updates were used de facto by the military and others for decades despite numerous government reports documenting accumulating scientific research on both heating and non-heating impacts. Dr. Zorach R. Glaser compiled over 2,000 studies reporting behavioral, cardiovascular, neurological, ocular, and endocrine impacts in a 1971 Naval Medical Research Institute (NMRI) Report (79), later updated to over 4,600 studies in a 1977 report which Glaser issued under the National Institute of Occupational Safety and Health (NIOSH) (79–82).

Beginning in 1976 until at least 1987, the Office of Naval Research, along with the National Telecommunications and Information Administration, produced quarterly *Biological Effects of Non-ionizing Radiation* reports, which included the ongoing research conducted in the Soviet Union (83). These publications compiled full research abstracts, including numerous reports of biological effects at non-thermal exposure levels that concluded more research was needed. Soviet literature in these reports described significant neuroendocrine and nervous system impacts as well as cardiovascular alterations, immune system changes, reproductive effects, and behavioral disturbances, many occurring at levels below Schwan's limits.

How did U.S. federal agencies develop current RFR limits?

The Environmental Protection Agency, with authority regarding ionizing and non-ionizing radiation exposures, has historically played a lead role in this subject. Although the agency was repeatedly tasked with developing federal safety standards for public exposure to RFR over several decades (84, 85), its attempts were unsuccessful, and proposed limits were never finalized (86). This section outlines how U.S. limits were not derived through a public health agency-led risk assessment process but rather by the FCC's adoption of standards developed by military and industry-affiliated groups.

In 1978, the U.S. Comptroller Report recommended that the EPA establish RFR standards highlighting several studies that found biological impacts at low non-thermal intensities, below the 10 mW/cm^2 ANSI limit, and described how the EPA already had 5 professionals using a mobile van equipped with a measurement system to monitor environmental levels (85).

While the EPA ramped up its research, ANSI and IEEE further developed their standards as detailed in Table 1. Their 1982 limit introduced the whole-body Specific Absorption Rate (SAR), a measure of the rate of absorption into tissue, as the relevant metric (87). The SAR limit of adverse effect was based on the original Tri Service era assumption that heating was the primary and only established effect. As described by the ICBE-EMF in their paper detailing the inaccuracies of the assumptions underlying FCC and ICNIRP limits, "these limits were based on results from behavioral studies conducted in the 1980s involving 40–60-min exposures in five monkeys and eight rats, and then applying arbitrary safety factors…" (10). The behavioral studies measured the internal temperature at which exposed animals stopped food-seeking behavior. Thus, the SAR limit was not based on risk modeling from long-term carcinogenicity or epidemiological health studies.

Importantly, the ANSI/IEEE 1982 standard noted non-heating related effects at SAR levels below 4W/kg but discounted their relevance. For example, page 13 states, "…modulation-specific effects, such as efflux of calcium ions from brain materials were not considered adverse because of the inability of the subcommittee members to relate them to human health" (87). ANSI/IEEE also noted (page 14), "other characteristics of an incident field such as modulation frequency and peak intensity may pose a risk" and (page 15) that "peak SARs in a biological body can range more than an order of magnitude above the average SAR over a limited mass of the exposed tissue".

Later that same year, the EPA announced its intention to establish federal RFR limits in the *Federal Register* stating, "The continuing and rapidly increasing number of radiofrequency radiation sources in communications, transportation, defense, industry, consumer products, security, and medical applications has produced a RFR environment to which the entire population is continuously exposed, has increased the magnitude of environmental levels to which members of the public are exposed, and has increased the number of persons exposed to higher environmental levels" [(88), p. 57339].

In 1984, the U.S. Science Advisory Board (SAB), an independent advisory committee to the EPA (89), reviewed the EPA's draft report on biological impacts of EMFs and stated that the report represents an adequate statement of the current scientific literature and can serve as a scientifically defensible basis for the EPA's development of radiation protection guidance (90). The SAB recommendation includes quotes from numerous agencies going back years, requesting the EPA develop human exposure limits. Internal documents indicate EPA's proposed safety limit for exposure was ten times stricter than the ANSI/IEEE 1982 guidelines, but the proposal was never issued due to conflicts within the agency (91).

In 1985, the EPA's Report *The Biological Effects of Radio Frequency Radiation* was released, which concluded a critical level of adverse effects at a SAR threshold of 1 W/kg (92). This threshold is notably lower by a factor of 4 than the 4 W/kg threshold of ANSI/IEEE C95.1-1982, which the FCC adopted as its guideline

TABLE 1 Timeline of key RFR exposure standards and reports leading to U.S. guidelines.

Date	Standard	Limit
1966	ANSI C95.1-1966	The first U.S. consensus standard adopted Schwan's recommendation of 10 mW/cm^2 to address heating impacts.
1971	ANSI C95.1-1971	ANSI retained 10 mW/cm^2 as an occupation guideline, averaged over 6 minutes. OSHA adopted the ANSI limit, ruled to be advisory only.
1978	U.S. Comptroller Report	The report *More Protection from Microwave Radiation Hazards Needed* recommended that the EPA establish an environmental exposure standard to protect the general public and that the Occupational Safety and Health Administration (OSHA) establish an occupational limit to protect workers based on a current evaluation of scientific data (85).
1982	ANSI/IEEE C95.1 1982	Introduced frequency-dependent limits for power density. The SAR threshold of adverse effects was 4 watts per kilogram (4 W/kg) SAR over the whole body based on animal behavioral disruption studies. A reduction of ten was incorporated to arrive at the limit 0.4 W/kg for whole body SAR. This limit was adopted by the FCC in 1985.
1986	NCRP Report No. 86	National Council on Radiation Protection (NCRP) report, based on literature though 1982, iterated the 4 W/kg thermal threshold but recommended public limits be one-fifth of the 0.4 W/kg worker limit resulting in a.08 W/kg whole body SAR limit. The averaging time was extended from 6 minutes (workers) to 30 minutes for the public. NCRP introduced localized SAR limits for exposure from devices close to the body of 1.6 W/kg for the public and 8 W/kg for workers.
1986	EPA Proposes 4 Options for RFR Limits	The EPA proposed 4 options for RFR limits along with associated financial costs and concluded that adverse human health effects were associated with whole-body average SARs of 1 to 4 W/kg or greater (93, 94). Options 1- 3 were 0.04, 0.08 and.4 W/kg respectively. Option 4 was to develop technical information, not a limit, to control exposure.
1991/1992	ANSI/IEEE C95.1 1992	IEEE introduced controlled (worker) vs uncontrolled (public) limits, still based on the 4 W/kg heating effect threshold. They maintained the.4 W/kg (10x reduction) whole body SAR for workers and set 0.08 W/kg (5x reduction) for public exposure, extending the averaging time from 6 minutes (workers) to 30 minutes for the public. ANSI ratified the limit in 1992 (95).
1993	FCC 93-142 Proposal to Adopt RFR Limits	FCC initiates a Notice of Proposed Rulemaking (NPRM) which recommends using the IEEE C95.1 1992 standard but requests comments on possible alternatives such as NCRPs lower limits for 1.5 to 300 GHz frequencies.
1995	EPA launches renewed research effort toward recommending human exposure guidelines.	The EPA presented a timeline to the FCC on its renewed efforts toward developing a safety limit that addressed both heating effects and modulation, convened a revived interagency workgroup (RFIAWG), and commissioned the NCRP to study the potential role of modulated RFR bioeffects (84, 86). Ultimately, the NCRP study and EPA's efforts were not completed.
1996	FCC Adopts RFR Limits	FCC adopts RFR limits based on both NCRP Report No. 86 and IEEE/ANSI C95.1 1992

for new wireless facilities that same year, stating that RFR was a proper environmental concern of the agency (96). In 1986, when the EPA finally proposed possible federal limits, they stated that adverse effects were associated with SARs starting at 1 W/kg, and their research summary highlighted non-thermal effects such as calcium efflux, the potential for cancer promotion, and frequency-specific effects such as changes in brain energy metabolism (93, 94). Ultimately, the agency never issued a decision in the proceeding.

The EPA also never completed another review of the science on the biological effects after its 1984 report. While fully reviewing the intertwined policy history of powerline frequency EMF and magnetic fields is beyond the scope of this paper, it is important to note that, like RF, federal agencies never developed a safety standard for these lower frequency non-ionizing exposures. Reports on non-ionizing EMFs were drafted and redrafted but never finalized (97, 98). In 1990, the EPA released a draft report that recommended designating powerline-frequency EMFs as "probable human carcinogens" and RFR as a "possible human carcinogen" [(97), p. 1]. This conclusion was deleted from the subsequently released draft, which stated it was inappropriate to compare EMFs to chemical carcinogens and EMFs were a possible, but not proven, cause of cancer in humans (99). The EPA Science Advisory Board (SAB) and federal agencies repeatedly reviewed the draft, but it was ultimately shelved (100).

All the while, the U.S. stayed up to date on the ongoing research, including that of the Soviet Union and Eastern Europe. The 1988 Air Force Report on the biological effects of RFR includes an overview of research that found cardiovascular, immunological, and hematological effects, stating, "…exposure to RF/MW radiation is known to have a biological effect on animals and humans. Damage to major organs, disruption of important biological processes, and the potential risk of cancer represent the dangers of RF/MW radiation to living organisms. Pulsed radiation appears to have the greatest impact on biological materials" [(101), p. 2]. Yet in 1991, when IEEE revised the ANSI limits and introduced limits for the general public (see Table 1), they argued against a larger limit reduction for the general public because "no reliable scientific data exists" showing certain population subgroups are more at risk or that duration of exposure can impact risk (95). Again, they stated that non-thermal and modulation-specific effects were not meaningfully related to human health.

Importantly, the EPA stated in 1995 that it was poised to issue RFR limits (102). As shown in the EPAs presentation (Figure 1), Phase 1 would address thermal effects (understood as not including modulation or chronic exposure), and Phase 2 would address biological impacts of modulated and non-thermal exposures. However, again, EPA's work on developing safety limits was halted. That year (1995) the Senate Committee on Appropriations cut $350,000 from the EPA EMF budget, because "the committee believes EPA should not engage in EMF activities" [(103), p. 5]. The U.S. House of Representatives also cut EMF programs. In addition to the budget cuts, several staffers reportedly blamed the dismantling of the research program on senior officials for not wanting to revisit such a controversial subject (98), some of whom then went on to work for the telecommunications industry (104).

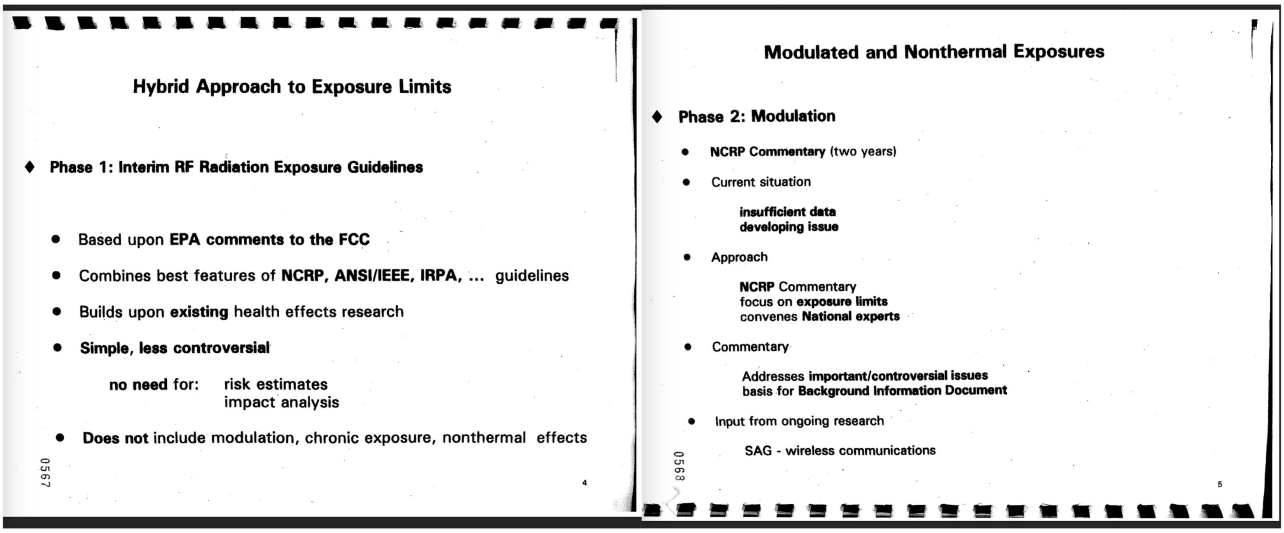


FIGURE 1
1995 briefing for the FCC by the EPA on the development of RFR exposure guidelines (102). Figure from U.S. government document in the public domain (102).

FCC promulgates human exposure limits in 1996

In 1996, with the EPA's standards development shuttered, the FCC adopted limits (Table 2) (9, 105) based on recommendations from the ANSI/IEEE C95.1-1992 standard (95) and the NCRP 1986 Report (106), which are both based on the 4W/kg SAR heating threshold of harm identified in acute animal studies conducted in the 1980s and earlier (10). Thus, FCC limits are not federally established, health-protective safety standards for long-term exposure, as they were not developed through a formal hazard/risk assessment that evaluated toxicity and dose response by health agencies (107).

The National Toxicology Program animal studies

The U.S. Food and Drug Administration (FDA), aware of the data gaps regarding long-term, chronic exposures, nominated the National Toxicology Program (NTP) under the National Institute of Environmental Health Sciences (NIEHS) to conduct large-scale animal research on carcinogenicity in 1999 because "…the existing exposure guidelines are based entirely on protection from acute injury from thermal effects of RFR exposure and may not be protective against any non-thermal effects of chronic exposures" [(108), p. 2].

The ensuing NTP research effort spanned decades. As presented in the 2008 U.S. Congressional (109) and 2009 U.S. Senate (110) subcommittee hearings on cell phone radiation health effects, the NTP built special chambers and initiated large-scale animal studies exposing rats and mice to cell phone radiation for up to 2 years. In 2018, the NTP final report concluded significantly increased gliomas of the brain and schwannomas of the heart in male rats (111). An expert peer review panel concluded the schwannoma data indicated "clear evidence" of an association between RFR and cancer. Additionally, DNA damage, reduced pup birth weights, and the induction of cardiomyopathy of the right ventricle of the heart were observed (111, 112). Notably, when New Hampshire 5G Commissioner Denise Ricciardi asked, "You found damage, so doesn't that mean that FCC's assumption that only heating can cause damage is incorrect and no longer accurate?" NTP's scientist Michael Wyde replied, "A lot of people believe unless you heat tissues, you won't see health effects with RF. This study disproves that, as we did not have overheating, but we did see damage" [(113), p. 139].

However, the FDA disagreed with the conclusions and repeatedly issued statements discounting the animal study's relevance to humans (114, 115) despite NTP's own experts maintaining that the findings were relevant to human health assessment (19, 112, 116). Further, the FDA did not release any reports providing a quantitative risk assessment on the NTP study data to inform an understanding of the implications for human health. Published analysis of the NTP data by non-government U.S. scientists concluded that FCC human exposure limits should be strengthened by at least 200-to 400 times to protect children (45).

Nonetheless, in 2019, the FCC terminated its 7-year inquiry, which had asked if the 1996 limits needed to be revised (117). Referencing the FDA's dismissal of the NTP findings, the agency announced the 1996 limits were adequately protective, stating, "We take to heart the findings of the Food & Drug Administration (FDA)... that the weight of scientific evidence has not linked cell phones with any health problems" [(172), p. 2]. The IEEE and ICNIRP subsequently issued revised RF-EMF exposure limit recommendations, discounting the NTP study findings and reiterating that acute heating effects were the only established harm (11, 12).

Although the NTP later initiated new studies to investigate the DNA damage they had observed (118), in 2024, they stated

TABLE 2 FCC general public (A) and occupational (B) limits for RFR: SAR limits and maximum permissible exposure (MPE) limits.

A. FCC limits for general public/uncontrolled exposure to RFR				
Specific absorption rate (SAR) limit				
Whole body SAR	Local SAR head and trunk	Extremity local SAR hand, wrist, feet, ankle, pinna (outer ear)		
0.08 W/kg Averaged over whole body	1.6 W/kg averaged over 1 gram cube of tissue	4.0 W/kg averaged over a 10-gram cube of tissue		
Maximum public exposure (MPE) limit				
Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm^2)	Averaging time (minutes)
0.3–3.0	614	1.63	(100)	30
3.0–30	842/f	2.19/f	($180/f^2$)	30
30–300	27.5	0.073	0.2	30
300–1,500			f/1,500	30
1,500–100,000			1.0	30
General public limits apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure. Public limits are used for consumer devices such as cell phones (9, 105). f, frequency in MHz.				
B. FCC limits for occupational/controlled exposure to RFR				
Specific absorption rate (SAR) limit				
Whole body SAR	Local SAR; head and trunk	Extremity Local SAR; hand, wrist, feet, ankle, pinna (outer ear)		
0.4 W/kg; averaged over whole body	8.0 W/kg; averaged over 1 gram cube of tissue	20.0 W/kg; averaged over 10 grams of tissue		
Maximum public exposure (MPE) limit				
Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm^2)	Averaging Time (minutes)
0.3–3.0	614	1.63	(100)	6
3.0–30	1,824/f	4.89/f	($900/f^2$)	6
30–300	61.4	0.163	1.0	6
300–1,500			f/300	6
1,500–100,000			5	6
Occupational limits apply when exposure occurs as a consequence of employment provided the individual is "fully aware" of the potential for exposure and can exercise control over the exposure. "Fully aware" means the person has received written and/or verbal information explaining the potential for RFR exposure. With the exception of transient persons, "fully aware" also means the person has received appropriate training regarding work practices relating to controlling and mitigating exposure. Occupational limits also apply where exposure is of a transient nature as a result of incidental passage through a location where levels may be above general population limits, as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other means (9, 105). f, frequency in MHz.				

MPE limits are frequency-dependent and are generally used for compliance related to the ambient environmental levels created by cell towers and wireless network infrastructure. "Portable devices" are defined as devices (such as cell phones) used within 20 cm of the user's body, and they require compliance with local SAR limits for 100 kHz to 6 GHz and power density limits for frequencies above 6 GHz.

that these follow-up studies had ceased because it was "technically challenging and more resource-intensive than expected" (119). They released a 2025 report documenting a lack of effects in one completed 5-day pilot study but state that, "high-quality studies to understand the effects of RFR exposure on biological responses are needed given the widespread human exposure to RFR associated with cell phone use" (120). Despite the 5.3-million-dollar price tag, the exposure system for the follow-up research was "disassembled following completion of the studies, and the chambers are not available for other scientists" (121).

What are the current EMF bioeffect research activities of relevant U.S. federal agencies?

While the push to fast-track wireless development is framed as a geopolitical race with China and Russia (122), these nations, along with the European Union, India, and numerous other governments, at least fund research programs studying health and wildlife impacts of wireless technology (123–126). Absent from the U.S. is a parallel effort to ensure rigorous science-based

evaluation (127). As detailed in Supplementary material 1, U.S. agencies, defunded years ago, lack current research activities and administer little oversight, allowing industry to successfully use the race narrative to support deregulation efforts at the federal, state, and local levels (128).

Supplementary material 1 lists details the near absence of current EMF bioeffect research activities by key U.S. agencies and entities including the Environmental Protection Agency (EPA), National Institute for Occupational Safety and Health (NIOSH), Department of Labor Occupational Safety and Health Administration (OSHA), National Cancer Institute (NCI), Centers for Disease Control and Prevention (CDC), Food and Drug Administration (FDA) and the U.S. Fish and Wildlife Service (USFWS), the U.S. Radiofrequency Interagency Work Group (RFIAWG), FDA's Technical Electronic Product Radiation Safety Standards Committee (TEPRSSC) as well as the recent directive that Health and Human Services (HHS) report on knowledge gaps.

Notably, in 1999 and 2003, federal experts of RFIAWG issued a critique of federal limits as "outdated and insufficiently protective," highlighting 17 critical issues including the lack of biological basis, inadequate dosimetric modeling, failure to address modulated exposures, flaws in the two-tier occupational/public system, insufficient attention to long-term health effects and problems with how averaging over time and tissue volume can mask peak exposures. They called for a comprehensive scientific review with evidence-based standards to better protect public and worker health (129, 130).

While most U.S. federal agencies maintain web content with broad, often dismissive statements about health risks, none have issued formal health risk evaluations evaluating the totality of current scientific evidence. Although the FDA did release a literature review (131) dismissing the NTP findings, its conclusions of safety were roundly criticized on several counts, including a lack of adherence to quantitative risk assessment methodology (132). Further, the report was narrowly focused and confined to cell phones and cancer, omitting all consideration of non-cancer health endpoints and of effects from environmental exposures. No health agency other than the FDA has issued any type of report attempting to review the issue since the 1986 EPA Report. Mouzaffar states that "the FCC and FDA have failed in their obligation to prescribe safe RFR guidelines produced from wireless communication devices to protect the public health and safety" [(133), p. 227].

With NTP research halted, the only ongoing studies appear to be conducted within the Department of Defense. James Lin, former ICNIRP Commissioner, states that the recent research at the Air Force RF Bioeffects Branch and the Defense Advanced Research Projects Agency (DARPA) represents a "paradigm shift" into exploration of non-thermal impacts (134). Their studies utilizing FCC-compliant exposures have reported epigenetic impacts and brain pressure levels from pulsed microwaves comparable to football injuries (31, 39). In 2019, the Air Force Radio Frequency (AFRF) Bioeffects Branch awarded a $30 million contract to General Dynamics Information Corporation (135) with the initial solicitation stating that research results would be utilized for national and international health and safety standards and used for Air Force occupational safety, as well as to support the development of directed energy technologies (136, 137). In 2025, another solicitation was posted at $39.7 million (138). However, there is no evident coordination with non-civilian agencies, as the Air Force did not submit comments to the FCC in its RF-related proceedings (117).

The World Health Organization (WHO)

With federal reports lacking, the WHO is often referenced as an authority. However, the existence of two separate entities housed under the WHO umbrella, the EMF Project and the World Health Organization's International Agency for Research on Cancer (WHO/IARC) has complicated the public and policymakers' understanding of the WHO's conclusions on RFR safety.

In 2011, the WHO/IARC classified wireless RFR as "possibly carcinogenic" (Group 2B) (139). Their advisory group has, in 2019 and again in 2024, recommended wireless RFR be re-evaluated as a high priority (140, 141) due to the epidemiological and experimental animal studies published since 2011. Several analyses, disagreeing with the ICNIRP, IEEE and FDA's dismissal of the NTP, conclude that the animal experiments of the NTP, along with those of the Ramazzini Institute in Italy [which used much lower wireless exposures than the NTP to mimic cell tower environmental levels (45)] have strengthened the evidence base and could justify the WHO/IARC upgrading the classification of RFR to a "probable" or even to "known" human carcinogen (16, 20, 23, 112, 142, 143). However, as of this writing, the WHO/IARC has yet to announce a date to convene expert working groups on RFR.

In contrast to the WHO/IARC, which removed scientists from its working group in 2011 due to conflicts of interest (144), the EMF Project has been criticized for its longstanding ties with industry and ICNIRP (76, 145–147). Michael Repacholi, the first chairman of ICNIRP, suggested that the WHO start the EMF Project in 1995, and he arranged for a large part of its financing to be from the telecommunications industry (76, 145).

The FCC referenced the WHO EMF Project webpages in support of its 2019 decision that its RFR limits were adequate (148). However, at that time, the EMF Project's last completed review on RFR health risks dated to 1993 (149). More recently, the WHO EMF Project has commissioned a series of systematic reviews on several health endpoints (150). While most of the reviews concluded the evidence did not show adverse effects and that more research was needed, these reviews have been sharply criticized by independent scientists (134, 151–156) for "numerous flaws, significant methodological concerns, as well as likely biases" which "undermine the validity of the authors' conclusions and raises serious doubts about the suitability of most of these reviews for informing policy or risk management decisions (156). While one or more members of ICNIRP were involved in each systemic review (156), none of the WHO-commissioned review scientific teams included any of the over 250 scientists who signed the EMF Appeal, a petition to the United Nations by international scientists calling for stronger protections from non-ionizing EMFs (15, 157). However, safety cannot be assured from these reviews as the WHO-commissioned review on animal experimental evidence and cancer did conclude that there was "high certainty" evidence associating

RFR with two tumors, gliomas and schwannomas, also reported in human studies of long-term cell phone use (158).

Further, while the WHO commissioned reviews are referenced as "one of the most comprehensive evaluations of environmental health evidence to date" [(150), abstract], they did not include reviews focused on endpoints such as genotoxicity, synergistic effects, and impacts to the immune and endocrine systems.

How have laws and legal decisions shaped governments' response to possible public health impacts?

Section 704 of the Telecommunications Act (TCA) of 1996 prohibits state and local governments from regulating cell tower placement based on "environmental effects" of RFR emissions, as long as emissions comply with FCC limits (159). This provision has been interpreted by some courts as a federal preemption, allowing it to serve as both a regulatory safe harbor, shielding the industry from liability for health-related damages, and a de facto gag rule, silencing public discussion and allowing industry to threaten lawsuits when health is raised during public hearings/siting decisions (159–161). Before the passage of the TCA, many state and local authorities had adopted ordinances that restricted the number and location of wireless towers and base station antennas due to health concerns (160). But now these governments, which have a statutory responsibility to protect the health, safety, and welfare of citizens, have been largely stripped of their ability to protect schools, homes, and wildlife areas.

The situation is a legal quagmire as federal agencies have failed to ensure up-to-date, rigorous scientific reviews, yet policymakers are effectively barred from voicing concerns that risk could exist as federal regulations are outdated. Section 704 not only prevents most decision-makers from expressing health-related justification for distancing cell towers from schools and homes, but it also denies judicial remedies and due process, offering no avenue to mitigate risk or any avenue to address harm (159–161).

Section 704, as applied, transgresses several constitutional issues, many of which have been raised in legal challenges over the years without avail due to one primary early ruling, *Cellular Phone Taskforce v. FCC* (162). In this case, filed just after the FCC promulgated its 1996 limits, numerous groups and petitioners argued that the FCC's RFR limits failed to account for evidence of non-thermal health effects. In 2000, the Court sided with the FCC, enshrining deference to its federal authority, based on the assumption that the FCC "could reasonably" expect agencies such as the EPA "to keep abreast of scientific developments in carrying out their missions" (162). The *Cellular Phone Taskforce* case became the cornerstone for all subsequent telecom cases when courts routinely deferred to the FCC authority regarding RFR emissions.

In the subsequently filed Petition for Writ of Certiorari, the U.S. Supreme Court was asked to review the decision by the petitioners' attorneys, including Whitney North Seymour, Jr. a former New York State Senator, former U.S. Attorney for the Southern District of New York and co-founder of the Natural Resources Defense Council (163). The petition highlighted the lack of federal agency activities as the central material error in the Second Circuit court's ruling that begs for re-argument today asking:

> "Where Congress has failed to fund continuing Federal research into potential adverse health effects of radiation emission from cellular phone towers, does Congress have the power to prohibit State and local governments from protecting the health of their citizens by taking into account available research and official standards from other countries in regulating the placement of cellular phone towers?" [(163), p. 1]

The Petition argued that:

> "…dated, inappropriate research, reviewed by authorities from inappropriate professions, is being used to reach conclusions about public safety concerning radio frequency radiation. Why has there been no better updating of the FCC standards? The answer is obvious: because Congress has not appropriated adequate funds to conduct non-thermal research by the key federal agency—EPA."
>
> "The Court's reliance on the EPA was technically correct but substantively naive. What the Court did not realize was that Congress terminated funding for radiation research by EPA in 1996, and no staff has been available at EPA to conduct such research for the past five years" [(163), p. 14].

In other words, the FCC did not have adequate expertise from the appropriate government agency to rely on regarding health effects from ambient RFR exposures. The Supreme Court did not take up the case in 2000. But now, over two decades later, the petition's arguments are even more relevant: no independent federal agency with environmental or health expertise is actively monitoring RFR risks from cell towers, and local governments remain hamstrung, fearing industry lawsuits should they speak on the issue of health effects in infrastructure siting decisions. While the FCC stated in its 2013 Inquiry, "…since the Commission is not a health and safety agency, we defer to other organizations and agencies with respect to interpreting the biological research necessary to determine what levels are safe" [(164), p. 3], there is no federal agency to defer to. This situation is more germane than ever for another legal challenge.

Federal court mandates FCC provide rationale for maintaining 1996 RFR limits

The second major challenge to FCC limits came after the agency decided to maintain its 1996 limits in 2019. In 2021, the U.S. Court of Appeals for the D.C. Circuit ruled in *Environmental Health Trust et al. v the FCC* (see Table 3) that the FCC's decision was "arbitrary and capricious," citing the agency's failure to address evidence submitted to the agency reporting a myriad of harmful effects at levels permitted under current regulations [(165), p. 9]. The FCC was ordered to explain how its limits were adequately protective on six issues: non-cancer health impacts, long-term effects, children's vulnerability, environmental impacts, compliance test procedures, and the significant technological changes/advances since 1996. As

TABLE 3 Timeline: Environmental Health Trust et al. v the FCC lawsuit on U.S. human exposure guideline inquiry.

Year	Event/action	Description
2012	GAO Report: "Exposure and Testing Requirements for Mobile Phones Should Be Reassessed" (171)	The Government Accountability Office (GAO) report recommended that the FCC formally reassess and, if appropriate, update its exposure limits and cell phone SAR test requirements stating: "The FCC RF energy exposure limit may not reflect the latest research, and testing requirements may not identify maximum exposure in all possible usage conditions" [(171), Highlights p. 1].
2013	FCC Opens Inquiry on RFR Exposure Limits (ET Docket No. 13–84) (117)	The FCC Inquiry requests comment on whether its 1996 RFR human exposure limits and policies should be reassessed. In summary: • Are the 1996 exposure limits appropriate to protect public health considering recent research? • Are additional exposure reduction and precautionary policies needed, especially regarding children? If so, would they be useful or counterproductive. • Should premarket SAR evaluation procedures require direct body contact positions? • Are SAR limits protective regarding metal implants, eyeglasses, jewelry, or metallic accessories. • Should the FCC require more disclosure around RFR exposure levels "perhaps in manuals, at point-of-sale, or on a website." • Should more consumer information on RFR exposure (on health, reducing exposure, and base station exposure) be provided to the public?
2013 to 2019	Hundreds of comments submitted to the FCC record in its inquiry (ET Docket No. 13–84)	Comments on the FCCs RFR Inquiry were submitted from scientific, medical and public health organizations, local governments, school boards, researchers, medical practitioners and the public.
2019	FCC decides to maintain 1996 limits and proposes new limits for ranges not previously regulated (172)	The FCC decides to maintain its 1996 limits without further review stating there is "no appropriate basis" to revise its RFR exposure limits, additional precautionary policies are not indicated and that revising SAR tests to require body contact positions is not necessary. The FCC also proposed expanding the range of human exposure limits to include new frequencies: • 300 kilohertz (kHz) down to 3 kHz, with sources such as wireless power transfer in electric vehicles. • 100 GHz up to 3 THz for future technologies. Comments on the newly proposed limits remain open under Docket 19-226.
2020	14 petition for judicial review (173)	Petitioners argue that the FCC decided its limits did not need to be revised without meaningfully addressing record evidence of cancer, neurological impacts, reproductive harm, electromagnetic hypersensitivity (EHS), children's vulnerability, wildlife impacts and how the premarket SAR tests are outmoded. Petitioners Environmental Health Trust (EHT), Consumers for Safe Cell Phones, Elizabeth Barris, and Theodora Scarato filed in the DC Circuit. Petitioners Children's Health Defense (CHD), Michelle Hertz, Petra Brokken, Dr. David Carpenter, Dr. Toril Jelter, Dr. Paul Dart, Dr. Ann Lee, Virginia Farver, Jennifer Baran, and Paul Stanley filed in the Ninth Circuit. CHD's case was consolidated with EHT's in the DC Circuit.
2020	Amicus briefs filed (174–177)	Four Amicus Briefs were filed: • Natural Resources Defense Council • Joseph Sandri with Declaration of Dr. Linda Birnbaum • Dan and Catherine Kleiber • Building Biology Institute
2021	U.S. Court of Appeals for the D.C. Circuit ruled in EHT et al. v FCC (165)	On August 13, 2021, the DC Circuit ruled the FCCs decision to maintain its 1996 limits as "arbitrary and capricious in its failure to respond to record evidence that exposure to RF radiation at levels below the Commission's current limits may cause negative health effects unrelated to cancer" [(165), p. 9]. and mandated that the FCC provide a reasoned explanation for how its limits were adequately protective regarding: • Children's health • Health implications of long-term exposure • Impacts to the environment • Cell phone and wireless device compliance test procedures • The ubiquity of wireless devices, and other technological developments since 1996 The Court noted the lack of meaningful comments from other federal agencies stating on page 15 and 16: "The silence of other expert agencies, however, does not constitute a reasoned explanation for the Commission's decision to terminate its notice of inquiry for the same reason that the FDA's conclusory statements do not constitute a reasoned explanation: silence does not indicate why the expert agencies determined, in light of evidence suggesting to the contrary, that exposure to RF radiation at levels below the Commission's current limits does not cause negative health effects unrelated to cancer. Silence does not even indicate whether the expert agencies made any such determination, or whether they considered any of the evidence in the record." As the FCC did not appeal to the U.S. Supreme Court, the decision stands.
2025	No response from the FCC to the Court mandate as the date of this publication.	

detailed in Table 3, as of this writing, the FCC has not responded to the court's mandate.

In their decision, judges highlighted how the FCC erroneously presented the "silence" of federal agencies as supporting the FCC's limits despite no agency having submitted a substantive, up-to-date science-based assessment (165). Although the FCC had requested input, agencies such as the EPA, National Cancer Institute, and National Toxicology Program (NTP) offered only cursory comments, and the Department of Labor acknowledged its lack of formal risk assessment (166–170).

In addition, the court noted how the FCC had over-relied on the FDA's one-paragraph conclusion (165, 169). The limited scope of the FDA's literature review (focused only on pre-5 G cell phones and cancer) renders it inapplicable to the court's concerns over long-term health effects from the ambient environmental exposures from cell tower networks, 5G's higher frequencies, wildlife impacts, and any studies of reproductive, neurological, and endocrine effects. While many of these issues would fall under the EPA's purview, the agency, defunded for ambient RFR exposure oversight, only submitted a two-sentence comment to the FCC (170) and did not respond to the FCC's request for a more substantive comment.

How does the U.S. policy approach compare to other countries?

The lack of regulatory updates has resulted in the US maintaining among the most lenient limits worldwide for environmental exposures, as detailed in Figure 2. The U.S. maintains a one-size-fits-all approach without additional protections for sensitive areas, such as schools, daycares, and homes. While many countries have adopted the thermally based limits of ICNIRP, several nations have implemented more stringent thresholds based on their scientific research or precautionary frameworks that attempt to mitigate risk. Graphic 1 shows the selected country's general public limit for 1,800 MHz W/m^2 equivalent plane wave density specifically applicable to schools and/or homes (178–184). Switzerland and Italy's limits in Figure 2 apply to places of "sensitive use" such as apartment buildings, schools, hospitals, permanent workplaces, children's playgrounds, and where people stay for hours. Biologically relevant changes have been documented at very low intensities, even lower than countries' more stringent limits (10, 16–18, 22, 26–28, 31, 44, 51, 53, 185–187).

Russian research on electromagnetism, dating to the 1840s, has long recognized non-thermal impacts, and its scientists have consistently recommended limits to address their observed biological impacts to the central nervous system (182). China also has active ongoing bioeffect research, and its scientists cited studies showing immune, behavioral, neurological, and reproductive impacts at levels below the 4 W/kg SAR heat threshold as the rationale for its tighter limits (46, 47, 188). The regulatory landscape is always shifting, and several nations, such as Poland, Belgium, India, and Italy, relaxed their rules under pressure from industry, which claimed strict limits would hinder 5G deployment.

In addition, in contrast to the U.S., countries have enacted various policy measures to provide oversight, transparency, and mitigate risk as presented in Table 4 (19, 179, 181, 184, 189–193).

Do current practices and agency activities ensure adequate oversight and protection?

In addition to the near absence of civilian bioeffects research, the U.S. lacks numerous other regulatory elements related to health, safety, oversight, and enforcement.

No premarket safety testing

Unlike the process for introducing new drugs, the U.S. lacks a process that requires premarket safety testing for health effects before new RF/EMF technologies are introduced. Thus, the FCC approved deployment of millimeter-waves and sub-terahertz frequencies (194, 195) for 5G and future networks and the agency continues to allow new technologies to be deployed despite research indicating heightened rates of absorption into the skin (196, 197) as well as into insects' bodies (198, 199). The FCC's 2019 rules fast-tracked the deployment of small cells, stating that 800,000 new wireless sites in the U.S. were needed for the 5G network, despite the reality that no agency with health or environmental expertise had ongoing research activities to ensure the safety of ambient exposures.

No post-market medical or health surveillance

There is no post-market medical or health surveillance system. The public, physicians, and environmental experts lack access to a formal reporting mechanism to document symptoms, diagnoses, or observed ecological changes following RFR exposure. No public database exists to track and analyze these incidents. The absence of health and environmental surveillance hinders the identification of patterns, allows early warning signals to be missed, and prevents data-driven policy.

Outdated premarket RFR compliance tests

New phones and wireless devices can be brought to market so long as they comply with the FCC's 1996 local SAR limits. While the U.S. head/body SAR limit (1.6 W kg) is more stringent than the ICNIRP limit (2.0 W/kg), the use of a heat-based limit as well as the lenient separation distances permitted in compliance test procedures, invalidates safety comparisons. A summary of just a few of the numerous problems identified in premarket SAR tests are presented in Table 5, with more comprehensive critiques in references (10, 18, 19, 129, 130, 200).

The FCC's 2 mm SAR tests

Cell phones are not required by the FCC to be tested in direct body contact positions because the test procedures are based on pre-1996 usage scenarios when phones were worn on belt clips. French government and independent investigations have documented that cell phones can exceed exposure limits when tested in real-world direct body contact scenarios (213, 214). In 2019, the authors' Freedom of Information (FOIA) request found that when the FCC tested cell phones at 2 mm from the body, mimicking a phone in the pocket, they measured SAR levels that exceeded the FCC's limit (215–217). Figure 3 presents the FCC's spreadsheet of its 17 body SAR measurements for 11 cell phones

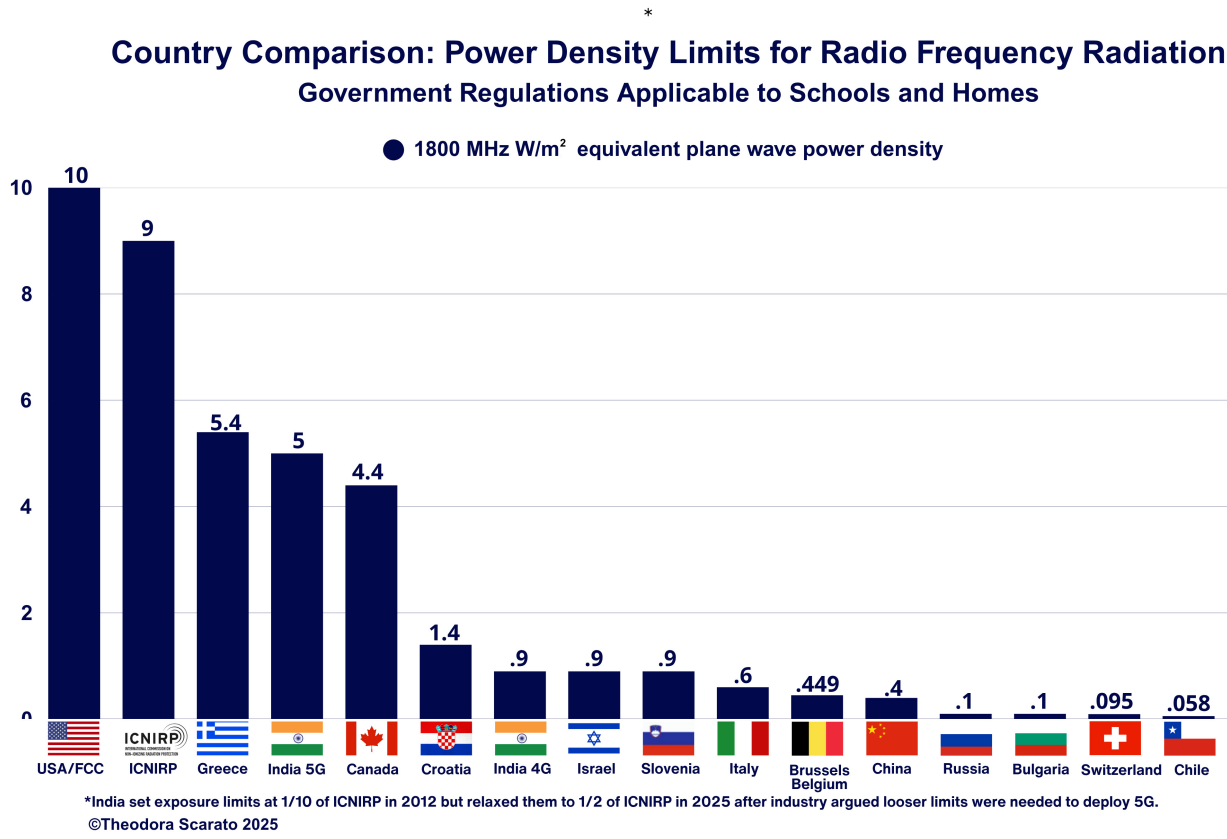


FIGURE 2
Comparing the U.S. to countries with more stringent RFR limits.

that the agency tested in the summer of 2019. Although the FCC's body SAR limit is 1.6 W/kg, 10 of the 17 FCC laboratory measurements exceeded this limit, one model by up to 325%.

If the FCC had tested the same phone models at 0 mm, mimicking direct body contact positions, the SAR levels likely would exceed FCC limits even more significantly, as conservative estimates indicate a 15% SAR increase for each mm of distance (213). The FCC FOIA data also highlights the variability in SAR measurements and +/−30% margin of error (or uncertainty factor) allowed by the FCC (218), as the same models had different SAR values depending on whether the phone was provided by the manufacturer or purchased by the FCC. Upon release of the records, FCC defended its decision not to take enforcement action, stating, "given that the RF exposure limit includes a significant safety margin, none of the results suggest there is any RF safety issue with the devices tested" (219). However, the released records also show that a few years prior, the FCC had forced a recall on an Andy 4G Smartphone model due to violations at 170 % of the SAR limit, a far lower exceedance than the 325% reported in the FCC's 2 mm tests (217).

The FCC's lack of transparency regarding these findings had multiple impacts. The FCC did not disclose its 2 mm SAR measurements in its statements filed in two legal cases that centered on the issue, resulting in Telecom wins for both cases (220, 221). The FCC also did not submit its 2 mm data to its then-open inquiry regarding its rules and test procedures, and the agency maintained that changes to its test distances were "unnecessary" (172). However, the 2021 D.C. Circuit decision mandated that the FCC explain how these test procedures remain valid (165), and later that year the agency announced interim guidance with a transition period tightening the minimum distance from 25 mm to 5 mm (222). This change would bring the allowed test distance in line with the European Union, which already moved to 5 mm in 2016 (223, 224). However, as of this drafting of this paper, the guidance has yet to be finalized, and manufacturers can still choose a larger test distance. Further, a 5 mm distance still does not reflect today's real-world body contact usage, and phones that test compliant at 5 mm can still exceed limits in 0 mm body contact positions (213, 225).

No robust post-market surveillance, measurement, and compliance enforcement

The FCC does not have a robust post-market surveillance, oversight, and enforcement program for compliance with its FCC's regulations. This author's FOIA requests revealed the FCC has performed minimal post-market surveillance to ensure cell phones are compliant with its limits, with only 5 devices SAR tested from 2020 to November 2024 (226). In contrast, France has conducted

TABLE 4 Examples of international policies on wireless radiation to mitigate risk and ensure compliance.*

Action, law, policy or directive	Country examples
Public health recommendations	
Health agency public health advice that people should reduce exposure to cell phone RF radiation, especially for children.	United Kingdom, Russia, Switzerland, Finland, Ireland, Germany, Belgium, Greece, Israel, Turkey, Singapore, France, Denmark, India, Austria, Cyprus, Canada, Italy, French Polynesia, Republic of Korea, Sri Lanka, Croatia, Ivory Coast, European Parliament Resolution 1815
Public education campaign and/or a website that recommends and informs people how to reduce exposure.	France, French Polynesia, Israel, Italy, Cyprus, Tunisia, Switzerland, Belgium, Republic of Korea, Ivory Coast
Public health guidance to prefer wired over Wi-Fi in kindergartens and schools.	France, Israel, French Polynesia, Russia, Cyprus
Laws or policies to reduce exposures	
More stringent limits for environmental exposures from cell towers and wireless networks and/or policies to reduce levels below ICNIRP/FCC limits due to either a lower national limit or additional measures in "sensitive areas" (e.g., schools, daycare centers and hospitals).	Italy, India, Israel, Chile, Croatia, Ukraine, Kuwait, Greece, China, Russia, Canada, Switzerland, Belgium, Bosnia Herzegovina, Grand Duchy of Luxembourg, Greece, Belarus, Georgia, Serbia, Slovenia, Montenegro, Croatia, Bulgaria, Turkey Liechtenstein, Tajikistan, Kazakhstan, Uzbekistan, Kyrgyzstan, Moldova, Kuwait, Republic of Moldova, Iraq
Advertising mobile (cell) phones to young children prohibited	France, Belgium, French Polynesia
Sale of phones designed for young children prohibited	Belgium, France, French Polynesia (Minister of Health is authorized to ban)
Wi-Fi prohibited in daycares and kindergarten	France, Israel, French Polynesia (unless for specific activity), Cyprus (Directive)
Wi-Fi off or minimized in elementary classrooms	France, Israel, Cyprus (Directive)
Monitoring and measuring programs	
Measurement program to monitor nationwide environmental levels from cellular networks and ensure compliance.	France, Greece, Turkey, Romania, Serbia, India, Israel, French Polynesia, Croatia, Bulgaria, Tunisia, Malta, Brazil, Bahrain, Monaco, Bhutan, Senegal, United Kingdom, Australia, Spain, Austria, India, Israel, Gibraltar, Brussels Belgium, Switzerland, Norway, Lithuania
Post market surveillance program tests cell phones for SAR compliance.	France, Canada
Transparency measures	
Required labeling of cell phone radiation SAR levels on product packaging and/or point of sale.	France, Israel, India, Belgium, Russia, Republic of Korea, China
RF-EMF environmental level measurements from cell towers and base stations are publicly shared.	France, Greece, United Kingdom, Australia, Austria, Gibraltar, Belgium, Switzerland, Tunisia, Bahrain, Monaco, Senegal, Spain, Israel, Malta, Brazil

*This list is not based on a systematic review, and additional countries may also have relevant policies not included in this table.

robust post-market testing since 2012, evaluating hundreds of phones for RFR compliance (213) and triggering recalls or software updates for over 60 devices found to exceed EU limits (227). Some phone models that they tested at body contact reported SAR levels up to three times the EU limit, equivalent to up to 11 times the U.S. FCC's limit (213).

The case of the Apple iPhone 12

In 2023, France temporarily suspended sales of the iPhone 12 (model A2403) after its surveillance found SAR levels of 5.75 W/kg exceeding EU safety limits when tested in "on-body" scenarios mimicking a phone held in hand or carried in a pants pocket. Soon afterwards, Apple issued a software correction for the model to reduce radiation emissions, but only for the iPhone 12s in France. In 2025, 2 years later, a European Commission ruling then forced Apple to update the models EU-wide (228). The organization Phonegate Alert filed a legal complaint against the French government for failing to promptly inform the EU member states of the findings calling the two-year delay "unacceptable" and requesting corrective measures to be adopted "without delay" (229).

FOIA records released in 2024 document that the FCC had initiated its own iPhone 12 SAR tests when France first suspended sales in 2023, but technical problems delayed the process for months (230). However, the FCC has not released records of the measurements, nor is it known if Apple updated its U.S. models to reduce RFR emissions.

Cell tower and base station compliance issues

The compliance oversight regulatory gap also extends to wireless infrastructure such as cell towers and 4G/5G small cells, as the US operates on what is essentially the honor system. FCC does not regularly audit base station network antenna emissions, conduct surprise inspections, or review compliance reports. There is no federal requirement for annual or periodic post-installation testing. Wireless providers often submit self-funded engineering simulations, rather than real-world measurements, as proof of compliance. RFR compliance reports lack standardized formats, consistent measurement protocols, and clearly stated enforcement

TABLE 5 Selected critiques of SAR metric and SAR/SAM test regarding adequacy for health protection.

Element	Practice/procedure	Critique
SAR limit	Limit is based on heating impacts.	Studies used to identify heat threshold for limit are animal studies from early 80s and 70s with small sample sizes and under 50-min exposures (10). Limit is not based on biological impacts from non-heating intensities or chronic exposure.
SAR "safety" margin	FCC claims a large safety factor exists.	The reductions were only applied to the heat-based threshold. Arbitrarily selected uncertainty/safety factors are inadequate for public health protection and are not consistent with the approaches used by public health agencies (10).
SAR measurement of rate	SAR does not measure total dose.	SAR values are a measurement of the rate of energy absorption per a specified mass of tissue. SAR values do not reflect the total absorbed dose or cumulative exposure, unlike the metrics used in ionizing radiation limits (201). Thus, exposure is allowed to continue indefinitely so long as the rate remains within SAR limits, omitting consideration of total dose over time.
SAR averaging	SAR rate is calculated by averaging over tissue.	Averaging measurements over a volume of tissue (1 or 10 grams) obscures peak levels absorbed by specific tissues/organs (129, 130).
SAR test phantom	SAR tests use a 220-pound adult male SAM body phantom.	SAM does not ensure conservative evaluation of all users/bystanders' exposures (19, 69, 202, 203). Engineering studies have also demonstrated that children's thinner skulls, distinctive physiologies, and more conductive brain tissue result in significantly higher RFR absorption rates, especially in brain regions critical for memory and learning, such as the cerebellum and hippocampus (68–70).
SAR test phantom materials	SAM phantoms are a plastic shell filled with homogenous liquid of salt, sugar and surfactants.	Human brain and body tissue is not homogenous. The continued sole use of SAM, when more precise methods are available, ignores the complexity of human tissue as well as the unique anatomical characteristics of children and the developing fetus, disregarding the increased sensitivity of their rapidly developing brains (19, 40, 68–70).
Body SAR test usage positions	Rules allows separation distance between the phone and body.	FCC's authorized test positions do not reflect today's real-world usage scenarios. Although people use phones tucked in tight pockets or pressed against their chest and abdomen, manufacturers have long been allowed to use a separation distance, from 5 to 25 mm for body SAR compliance tests.
SAR test set up	SAR tests only one device at a time.	People are exposed to numerous devices and networks all at once (from cell phones to Wi-Fi routers/printers, wireless wearables, "smart" devices, cell towers, small cells, etc.), which can increase their total exposure (204–206). Premarket tests do not account for total real-world combined overlapping exposure.
SAR test environment	Laboratory tests omit real world parameters.	Various parameters omitted from FCC authorized tests can impact a person's exposure. For example, metal inside (implants), on (jewelry/piercings) or near the body (usage in trains, cars etc.) can significantly increase exposure (207–212).

requirements. Many landlords, as well as local and state agencies, assume safety is assured, unaware that there is no oversight to verify compliance or to ensure that recommended compliance measures are implemented.

Exceedances for base station antennas have been documented, especially for building-mounted antennas. As an example, a 2021 measurement study of a rooftop lounge area using professional-grade spectrum management tools documented RFR spikes up to 264% of FCC limits in a Crest Factor analysis (231). A 2014 Wall Street Journal investigation reported on RFR audits that found one in ten rooftop cell sites assessed violated FCC limits (232).

No EMF measuring or monitoring program

The U.S. no longer has a program to measure and monitor EMF levels, as the last federal report on the issue is an EPA report dated 1986 (233). Independent publications have documented increases since then. A 2018 multi-country study reported RFR levels in Los Angeles at 70 times higher than estimates in the 1985 report (234). A 2021 assessment in Pennsylvania concluded power densities produced by the 5G/4G LTE antennas are 10 to 100 times higher than older networks (235), and hotspots have been documented on the street close to "small cell" antennas in South Carolina (236).

In contrast, several other countries conduct real-time, 24/7 monitoring and/or publish antenna locations/measurements from their audits/spot checks, and many provide the information online on publicly accessible, easy-to-navigate maps. Frances' map presents RFR levels color-coded by intensity and even shows transmitter directions (237). India states it audits up to 10% of sites annually, publicly posting all results, and penalizing providers that exceed limits (238). Greece has a continuous measurement program via 500 sensors located across the mainland and islands, with data posted in an online map (239).

Importantly, such government compliance programs have faced significant criticism regarding rigor and methodology (240). The levels are averaged, omitting peak intensities. Analyses have found that reliance on the posted field measurements and theoretical calculations can underestimate exposure because they often exclude numerous frequency bands (such as from Wi-Fi, GPS, satellites, radar and military applications), and long-term monitoring indicates that the short-term spot measurements are too brief to fully capture the variability of EMF exposure over time (240). Inclement weather, for instance, can boost signal strength, and levels can peak at various times throughout the day. Most importantly, the campaigns generally conclude compliance with ICNIRP-based limits, which is then interpreted as proof of safety, despite the lack of protection for long-term effects (240).

Despite the criticisms, these platforms nonetheless still represent an attempt to measure environmental levels and transparently inform the public, something the U.S. government has failed to do. Regular and continuous environmental monitoring, ensuring assessment of an individual's total dose from all sources, record keeping, and making the data available to

FCC SAR Tests of Selected Cell Phones at 2mm Distance to Body

Screensave from Internal Documents Released Under FOIA by FCC: FOIA Control Nos. 2023-000281 and 2023-000325

CONFIDENTIAL *FCC INTERNAL ONLY*

*NOTE: THE FOLLOWING RESULTS ARE FROM SAR TESTS AT A SEPARATION DISTANCE NOT IN ACCORDANCE WITH FCC GUIDANCE

FCC ID	Manufacturer	Description	Sample Type	SAR Configuration	FCC Lab Measured SAR Value (W/kg)	Serial Number
BCG-E3091A	Apple	iPhone 7 Portable Handset	Provided by Manufacturer	WCDMA Band 4, RMC, 12.2 kbps, Ch 1513, Body, Bottom, 2 mm	1.440	C6K6HD69HG7N
BCG-E3161A	Apple	iPhone X Portable Handset	Provided by Manufacturer	WCDMA Band 2, RMC, 12.2 kbps, Ch 9262, Body, Bottom, 2 mm	1.350	C39VF007JH2Q
				GPRS 1900, GMSK, 2 Tx Slots, Ch 512, Body, Bottom, 2 mm	0.727	
BCG-E3218A	Apple	iPhone XS Portable Handset	Purchased by FCC	GPRS 1900, GMSK, 2 Tx Slots, Ch 661, Body, Back, 2 mm	2.340	GONZ50M7KPFR
				GPRS 1900, GMSK, 2 Tx Slots, Ch 661, Body, Bottom, 2 mm	1.990	
A3LSMG960U	Samsung	Galaxy S9 Portable Handset	Provided by Manufacturer	CDMA BC1, RC3, TDSO 32, Ch 600, Body, Back, 2 mm, Connect then Postion	4.520	R38K609SMYL
				CDMA BC1, RC3, TDSO 32, Ch 600, Body, Back, 2 mm, Position then Connect	4.380	
A3LSMG960U	Samsung	Galaxy S9 Portable Handset	Purchased by FCC	CDMA BC1, RC3, TDSO 32, Ch 600, Body, Back, 2 mm, Connect then Postion	No Data Yet	R3M706TT9A
				CDMA BC1, RC3, TDSO 32, Ch 600, Body, Back, 2 mm, Position then Connect	No Data Yet	
A3LSMJ337A	Samsung	Galaxy J3 Portable Handset	Provided by Manufacturer	WCDMA Band 4, RMC, 12.2 kbps, Ch 1312, Body, Back, 2 mm, Connect then Position	5.200	RF8KA1J3X6E
				WCDMA Band 4, RMC, 12.2 kbps, Ch 1312, Body, Back, 2 mm, Position then Connect	5.140	
IHDT56XC4	Motorola	Moto e5 play Portable Handset	Provided by Manufacturer	WCDMA Band 2, RMC, 12.2 kbps, Ch 9262, Body, Back, 2 mm, Connect then Position	1.390	359524090350295
				WCDMA Band 2, RMC, 12.2 kbps, Ch 9262, Body, Back, 2 mm, Position then Connect	1.360	
IHDT56XB1	Motorola	Moto g6 Play Portable Handset	Provided by Manufacturer	WCDMA Band 5, RMC, 12.2 kbps, Ch 4132, Body, Front, 2 mm, Connect then Position	1.980	351864090034178
				WCDMA Band 5, RMC, 12.2 kbps, Ch 4132, Body, Front, 2 mm, Position then Connect	1.980	
IHDT56XB1	Motorola	Moto g6 Play Portable Handset	Purchased by FCC	WCDMA Band 5, RMC, 12.2 kbps, Ch 4132, Body, Front, 2 mm, Connect then Position	1.080	351864309030062O
				WCDMA Band 5, RMC, 12.2 kbps, Ch 4132, Body, Front, 2 mm, Position then Connect	1.090	
YHLBLUVIVO5MN	BLU	Vivo 5 Mini Portable Handset	Provided by Manufacturer	GPRS 850, GMSK, 4 Tx Slots, Ch 128, Body, Back, 2 mm	2.200	1080021018057240
YHLBLUVIVO5MN	BLU	Vivo 5 Mini Portable Handset	Purchased by FCC	GPRS 850, GMSK, 4 Tx Slots, Ch 128, Body, Back, 2 mm	2.750	1080021018069900

FIGURE 3
FCC SAR tests at 2 mm distance find SAR values that exceed FCC's limit. Figure from U.S. government document in the public domain (217).

the public should be standard practice for non-ionizing EMF as a widespread environmental exposure.

A lack of public information and consumer awareness

Compounding the U.S. regulatory gaps regarding compliance, enforcement, and monitoring is a striking lack of transparency. Residents often become aware of new wireless infrastructure installations (e.g., 5G small cells and cell towers) only after the facilities have been approved, excluding communities from the decision-making process. While some localities will post locations of wireless facilities online, many do not. There is no federal public registry of all wireless antenna locations along with RFR compliance reports. Thus, the public is not informed of where network antennas are transmitting and what the expected or measured levels are. Public records requests for information are frequently met with delays, denials, or technical documents that the public cannot easily understand. There is also no database of RFR exposure-related complaints submitted to the FCC, nor the FCC's response.

Regarding personal devices, most consumers are unaware that their phones emit RFR and that manufacturer instructions, as detailed in Table 6, state that devices should be used at a specific distance away from the body to comply with FCC limits.

Local and state efforts to inform the public have been halted. Maine's "The Wireless Information Act," which required RFR statements on cell phone packaging, initially passed the State House and Senate in 2014, but failed to pass the routine implementation vote after lobbyists convinced lawmakers to switch their votes (248). The San Francisco and Berkeley unanimously passed *Cell Phone Right to Know* ordinances to inform consumers about RFR at the point of sale were halted by industry lawsuits, which argued that such initiatives violated corporate free speech rights (249–251).

Despite numerous requests that the FCC more transparently inform consumers in its 2013–2019 Inquiry, the FCC concluded that existing information "allows users to make informed decisions" (172). The FCC also submitted a statement in the Berkeley legal proceedings stating that the ordinance was federally preempted and "the information provided on its website and in cell phone user manuals is sufficient to inform consumers about the risk of RF exposure, and that additional notices risk "overwarning" and misleading consumers into believing that RF emissions from FCC-certified cell phones are unsafe" (221). As noted earlier, the FCC did not include its findings that SAR limits were exceeded at 2 mm to the Berkeley filing. Without knowledge of RFR, most people routinely carry phones in pockets or against their bodies, unknowingly allowing exposures that could exceed government regulations (213, 214).

No robust RFR or non-ionizing EMF protection program for workers

The U.S. does not have a coordinated, comprehensive federal program addressing non-ionizing EMF safety in civilian workplaces. OSHA's comments to the FCC stated, "RF emissions are not on OSHA's active regulatory agenda, so we have not conducted a comprehensive literature review or risk assessment on RF hazards" (168).

Decades ago, both the National Institute for Occupational Safety and Health (NIOSH) and the Occupational Safety and Health Administration (OSHA) had active EMF research programs and expertise. In 1995, Robert A. Curtis, then Director of the U.S. Department of Labor OSHA Health Response Team, recommended a Comprehensive RF Protection Program with "…traditional safety and health program elements including training, medical monitoring, protective procedures and engineering controls, signs, hazard assessments, employee

TABLE 6 Manufacturer's instructions for cell phone and wireless devices.

Brand	Model	RFR exposure statement
Apple	16	"iPhone is evaluated in positions that simulate uses against the head, with no separation, and when worn or carried against the torso of the body, with 5 mm separation" (241).
Samsung	Galaxy Z Fold 3 5G	"Body-worn SAR testing has been carried out at a separation distance of 1.5 cm. To meet RF exposure guidelines during body-worn operation, the device should be positioned at least this distance away from the body" (242).
LG	G8	"Body-worn Operation: This device was tested for typical use with the back of the device kept 0.39 inches (1.0 cm) from the body. To comply with FCC RF exposure requirements, a minimum separation distance of 0.39 inches (1.0 cm) must be maintained between the user's body and the back of the device" (243)
Google	Pixel 9 Pro XL	"In the countries where the Specific Absorption Rate (SAR) limit is 1.6 W/kg averaged over one gram of tissue, the highest SAR values for this device type are 0.92 W/kg when used against head with no separation and 0.99 W/kg against body with 1.0 cm (0.4 in) separation…Keep the device away from your body to meet the distance requirement" (244).
Amazon	Echo Smart Speaker	"This device should be installed and operated with a minimum distance of 20 cm between the radiator and your body" (245).
Samsung	HP Printer M301 Series	"While installing and operating this transmitter and antenna combination the radio frequency exposure limit of 1 m W/cm^2 may be exceeded at distances close to the antenna installed. Therefore, the user must maintain a minimum distance of 20 cm from the antenna at all times. This device cannot be collocated with another transmitter and transmitting antenna (246)."
Verizon	5G internet Gateway router	"To comply with FCC RF exposure compliance requirements, the antenna used for this transmitter must be installed to provide a separation distance of at least 20 cm from all persons (indoor), at least 54 cm from all persons (outdoor), and must not be co-located or operating in conjunction with any other antenna or transmitter (247)."

involvement, and designated responsibilities for program implementation" (252). It was never implemented.

NIOSH, whose experts previously recommended and developed precautionary measures to minimize EMF risk (253–256), never formally issued policies to employers nationwide nor did it issue a final report regarding its funded projects (2008–2014) to develop cost-effective methods to assess and manage workplace EMF exposure (256). No updates have been issued to its posted online resources, such as its 1996 *EMFs in the Workplace* factsheet (257).

There is a need to fully assess occupational exposures, especially with the evolution of modern technologies. Exposures could be exceeded in occupational settings involving dielectric heating of plastics, security, cosmetics and telecommunications and further research is needed to address 5G, and wireless power transfer (258, 259). Routine compliance checks are not required for building-mounted antennas despite maintenance workers, such as HVAC technicians and window washers, facing heightened exposure when working on rooftops and buildings. While OSHA can cite both employers and landlords, federal and state agencies lack active engagement in educating employers and workers about non-ionizing radiation exposure, leaving many workers unaware of potential risks or how to report them.

Accountability for cell tower climbers, referred to as "the most dangerous job in America," (260) remains diffuse, fragmented, and often unclear, especially because subcontracting is widespread and infrastructure is being built at a rapid pace. Although OSHA and the FCC have initiated activities to address these issues, preventable accidents continue to occur (261), and RFR is not a part of the conversation. A 2020 case report describes how a telecom engineer who was accidentally overexposed, seven years later developed demyelinating brain lesions and kidney and lung masses, which they believe were a delayed RFR injury, mimicking Multiple Sclerosis (MS) (262).

While the U.S. never implemented a federal program, the IEEE EME Safety Program (C95.7-2022) provides several key elements to assess, manage, and mitigate risk applicable to the workplace (263); however, elements are not required in most U.S. workplaces. In contrast, the European Union issued a 2013 Directive to member states on health and safety requirements regarding EMF exposure to workers, along with an implementation guide (264, 265). Although the Directive does not address long-term effects, it does include risk assessments and preventive measures, with special considerations for pregnant workers and those with medical implants.

Equally important is the need to re-evaluate FCC regulations regarding the separation of human exposure limits into occupational/controlled and general population/uncontrolled exposures. According to the FCC, the "Occupational" limit was designed to allow more exposure because a worker is trained on the issue, aware of their exposure, and able to exercise control over it. The "general public" applies to everyone else, regardless of all ages and health statuses, who are not aware of their exposure, and therefore less likely to control exposures. The assumption that a worker should be allowed to be exposed to higher RFR levels just because they are trained warrants an evidence-based re-evaluation. Since 1996, there has been a substantial increase in wireless infrastructure, impacting a worker's ability, no matter how trained, to control their exposure. Telecommunication technicians/tower climbers report that even though they verify that transmitters are powered down at a facility, they are working on, they can still be exposed to RFR antennas on nearby buildings, and sometimes transmitters are accidentally powered *back on* (266). From a logical standpoint, one could argue that workers should have *more* stringent exposure limits given their more prolonged exposures. Yet without active agency research, such questions are not being investigated in the U.S.

Workers in nearly all of today's modern jobs, such as those in emergency response, education, healthcare, retail, and service sectors, are exposed to chronic low-level RF radiation from wireless devices, including cell phones, headsets, walkie-talkies, Wi-Fi access, computers, boosters, and other wireless equipment. These exposures are not assessed or mitigated, and workers are largely unaware of the exposure.

No consideration for environmental impacts

U.S. regulations ignore wildlife as they were designed only for humans. Studies have observed that wireless radiation and non-ionizing EMFs can adversely affect wildlife, particularly insects, and impact plant health, yet no U.S. regulations currently exist to safeguard ecosystems from these exposures (185, 267–271). Levitt et al. (2, 185, 186) reports a broad range of impacts and the need to update policy in their three-part review of impacts to flora and fauna, "Numerous studies across all frequencies and taxa indicate that current low-level anthropogenic EMF can have myriad adverse and synergistic effects, including on orientation and migration, food finding, reproduction, mating, nest and den building, territorial maintenance and defense, and on vitality, longevity and survivorship itself. Effects have been observed in mammals such as bats, cervids, cetaceans, and pinnipeds among others, and on birds, insects, amphibians, reptiles, microbes and many species of flora" [(185), abstract].

Compliance test procedures ignore the airspace near antennas where flora and fauna live, e.g., birds and insects fly/nest/perch, or bats fly/feed, and trees grow. RFR levels close to antennas can exceed regulatory limits past 50 feet or far more, but facilities are generally deemed compliant because compliance tests only measure ground-level RFR or where people exist. While experts in wildlife and bioelectromagnetics are calling for safeguards (15, 186, 269, 271) and the European Union is funding research (123, 126), the U.S has never evaluated the impact of wireless densification on flora and fauna.

Additionally, former FCC attorney Erica Rosenberg, who served as Assistant Chief of the Competition and Infrastructure Policy Division at the agency, detailed the way the FCC's approach has systematically failed to fulfill its duties under the National Environmental Policy Act (NEPA) in "multiple and significant ways" (272). She details how the FCC's inadequate procedures have allowed most wireless infrastructure, including cell towers, small cells, and satellite networks, to be categorically excluded from meaningful environmental assessment how the FCC delegates much of the environmental review process to industry itself, with little oversight or tracking, stating the agency "fails to vigorously enforce its rules so that industry noncompliance is rampant" [(272), p. 26].

Risk mitigation measures and safeguards for the vulnerable

As detailed in the European Environment Agency's *Late Lessons from Early Warnings,* proving harm from corporate pollution can take decades (273), and the cost of waiting can have serious health implications. Roda and Perry considered the growing scientific literature in 2014 and concluded that, despite the incomplete state of scientific knowledge, a precautionary approach regarding base stations near children was aligned with European states' obligations under international human rights law (274). As detailed in Table 4, several countries have implemented policies to mitigate risk to children, regardless of whether health effects were considered proven/established or not. Belgium, like France, banned the sale of cell phones designed for young children, concluding that precaution was needed after the WHO/IARC 2011 classification (275).

Schools are a critical area for risk mitigation measures. France, Israel, Cyprus, and French Polynesia reduce Wi-Fi exposure in young children's classrooms, and numerous countries have banned cell towers on school property (19, 276). Cellular antennas installed near schools can increase the environmental exposures in classrooms (277, 278), and closer proximity to network antennas are associated with cancer, radiofrequency sickness, and altered biochemical markers (22, 279, 280). But while several local U.S. school boards have cell tower bans, there is no U.S. federal policy or guidance. In many economically disadvantaged communities, cell towers are proposed as an ideal way to address financial challenges, and parents have fewer resources to stop such installations.

Numerous international governments also have issued recommendations that parents "should" reduce children's exposure, explicitly stating that children could be vulnerable to effects (19, 179). Although the American Academy of Pediatrics, Santa Clara California Medical Association and Maryland State Council on Children's Environmental Health Protection have issued recommendations for families and schools on how to reduce cell phone radiation exposure (19, 281, 282), U.S. public health agency websites lack clear, straightforward advice and have, in the case of the CDC, even removed mention of the unique vulnerabilities of children (283, 284). The CDC, which previously drafted (284–286) and more recently funded, the development of website content on wireless with industry-tied experts (287, 288), only offers two tips "if you are worried" to reduce RFR exposure (289). The FDA's children and cellphone webpage has an image of a smiling teenager looking at his phone and states, "current scientific evidence does not show a danger to any users of cell phones from radio frequency (RF) energy, including children and teenagers" and offers 4 simple steps "that anyone, including children and teenagers, can take…" omitting information on children's unique vulnerability to environmental exposures (290).

Federal policies must also be strengthened to support people reporting symptoms from exposure (known as electromagnetic hypersensitivity, electromagnetic syndrome or microwave sickness) (3, 187, 280, 291) so that they are properly accommodated under the ADA, and that outdated FCC rules do not override civil rights protections.

Proposals to address regulatory gaps

In 2012, federal legislation in *The Cell Phone Right To Know Act* HR 6358, was proposed to address several of the above detailed regulatory gaps (292). It would have increased federal research grants for bioeffect research, directed the EPA to develop science-based exposure standards, directed the FDA to promulgate RFR labeling at the point of sale and online, and amended the 1934 Communications Act to exclude a prohibition on state or local government zoning regulation of personal wireless service facilities based on health effects. However, despite strong support by the largest group of children's doctors in the U.S., the American

TABLE 7 Recommendations of the New Hampshire State Commission 2020 Final Report on Health and Environmental Impacts of 5G and Evolving Technology (113).

Issue	Majority report recommendations
Scientific research	- Send a resolution to the U.S. Congress to require the FCC to commission an independent health study and review of RFR safety limits. - Establish new measurement protocols to evaluate high data rate, signal characteristics associated with biological effects and summative effects of multiple radiation sources. - Promote basic science and clinical research on electromagnetic hypersensitivity and biological effects, ensuring ADA protections are considered.
Environment protection	- Engage agencies with ecological knowledge to develop RF-radiation safety limits that will protect the trees, plants, birds, insects and pollinators. - Require the FCC, under the National Environmental Policy Act, to do an environmental impact statement as to the effect on New Hampshire and the country from 5G and the expansion of RFR wireless technologies.
Measurements	- Measure RFR intensities systematically throughout the state and develop a publicly accessible map to present the information. - Conduct RFR signal strength measurements for cell sites by independent contractors. - Include RFR measurement training for home inspectors in the Office of Professional Licensure and Certification.
Risk mitigation	- Require setbacks of 1,640 feet for new wireless antennas from residences, businesses and schools. - Equip cell phones and wireless devices with updated software that stops cell phones from radiating when positioned against the body. - Replace Wi-Fi with RFR free internet connections in schools and libraries. - Establish RFR free zones in commercial and public buildings, especially healthcare facilities. - Support statewide deployment of fiber optic cable connectivity with wired connections inside homes.
Awareness and education	- Educate the public on minimizing RFR exposure with multimedia public service announcements on radio, television and print. - Post warning signs in commercial and public buildings. - Label all poles or structures holding 5G antennas in public rights-of-way with RFR warning signs readable from nine feet away.

Academy of Pediatrics, the comprehensive legislation failed to make it to a vote (293).

In 2020, a New Hampshire State Commission created by legislation issued a Report on "The Environmental and Health Effects of Evolving 5G Technology" with 15 recommendations summarized in Table 7 to "protect people, wildlife, and the environment from harmful levels of radiation" after a year-long investigation into the subject (113). Numerous scientists provided testimony, and the Commission sent inquiries to federal agencies. The FCC did not respond, and letters from the FDA and NCI revealed their absence of a comprehensive scientific review (294).

Is there evidence of regulatory capture?

There is evidence of a decades-long industry regulatory capture of key U.S agencies, particularly the FCC. As Seymour and Seymour stated in 2013, "This failure to update safety standards in the face of increasing scientific evidence of biological harm to humans and wildlife is a graphic example of the corrupting effect of industry money on Congress, and a perfect example of why huge amounts of industry money compromises democracy" [(159), p. 175].

In 2015, Norm Alster, a journalist on a writing fellowship at the Edmond J. Safra Center for Ethics at Harvard University, published the report *Captured Agency, How the Federal Communications Commission Is Dominated by the Industries it Presumably Regulates*, detailing how the FCC operates under the "undue" influence of the wireless industry, enabled by a revolving door between FCC leadership and the wireless industry lobby and consulting law firms (295). In turn, he says, "the wireless industry has been allowed to grow unchecked and virtually unregulated, with fundamental questions on public health impact routinely ignored" [(295), p. 5]. At that time, Tom Wheeler, former CEO of the Cellular Telecommunications and Industry Association (CTIA), an industry trade group, had become the Chair of the FCC. Like the industry-tied leadership before and after him, Wheeler pursued an aggressive deregulatory agenda, opening up millimeter wave spectrum, stating that American leadership in 5G must be a national priority (296). As Table 8 illustrates, this dynamic remains firmly in place today.

Former FCC Chair Ajit Pai was recently appointed to lead the CTIA, succeeding Meredith Attwell Baker, also a former FCC Commissioner. During his tenure at the FCC, Pai passed sweeping fast-tracking rules that stripped local authority regarding 5G and wireless infrastructure (297). As of this writing, the current FCC Chair is Brendan Carr, an attorney who previously represented telecommunications companies, including the CTIA, in its legal challenge against San Francisco's cell phone right-to-know ordinance (298). Before he was appointed FCC Chair, Carr co-authored a chapter in Heritage Foundation's Project 2025 that included telecommunications industry-friendly recommendations such as further streamlining the infrastructure permitting process, expediting satellite reviews, and limiting government fees (299). Under his leadership, the FCC has already approved measures to accelerate satellite licensing (300), and the agency is poised to act on more wireless streamlining proposals that would weaken environmental review processes and dismantle state and local authority regarding cell towers (301).

To fully understand the close ties between federal regulators and the telecommunications industry, it is critical to also examine the evolution of law firms that consult for the industry. In 1974, President Richard Nixon appointed Richard E. Wiley as FCC Chairman. After leaving the FCC, Wiley co-founded a Washington, D.C. law firm now known as Wiley Rein LLP. The New York Times profiled Wiley in 1992 as a man of significant influence (303) and the Los Angeles Times in 2001 dubbed Wiley the unofficial FCC sixth commissioner (304) due to his impressive impact on telecommunications policy. Wiley Rein LLP, along with the law firm of Gibson, Dunn & Crutcher, represented industry clients, including CTIA—The Wireless Association, in their litigation opposing San Francisco and Berkeley's cell phone right-to-know ordinances (305–307) and they have employed many FCC Commissioners and lawyers as detailed in Table 8.

As an example of the revolving door beyond the Commissioners, Thomas M. Johnson Jr., worked at Gibson

TABLE 8 The revolving door between FCC commissioners and the telecommunication industry examples from 1996 to current.

Name	FCC position	Wireless industry tie/position
Brendan Carr	FCC Chair (2025 to present) FCC Commissioner (2017–2025)	Attorney, Wiley Rein LLP representing telecommunication companies (2005-2007, 2009–2012)
Ajit Pai	FCC Commissioner (2021–2025) FCC Chair (2017–2021) FCC Commissioner (2012–2017)	President/CEO of the CTIA (2025 to present) President, Searchlight Capital Partners which specializes in telecom investments (2021–2025) Verizon Associate General Counsel (2001–2003)
Anna M. Gomez	FCC Commissioner (2023–present)	Partner at Wiley Rein, Media & Technology Practice (2013–2022) Vice President State and Federal Regulatory, Government Affairs, Sprint Nextel 2006–2009
Nathan A. Simington	FCC Commissioner (2020–2025)	Senior Counsel at Brightstar "the #1 specialized wireless distributor in the world" (2017–2022)
Thomas Johnson	FCC General Counsel (2017–2021)	Partner & Co-Chair, Appellate Practice at Wiley Rein LLP (2021–present) Gibson, Dunn & Crutcher (2006–2016)
Bruce Romano	Associate Legal Chief at FCC's Office of Engineering and Technology (OET) (1978–2018 Media Bureau and OET)	Wiley Rein LLP where he assists clients in navigating FCC policies and procedures (302) (2018–at least 2024)
Tom Wheeler	FCC Chair (2013–2017)	President of Shiloh Group LLC, telecom sector investments and strategy (2017–present) President and CEO of the CTIA 1992–2004 President and CEO of the National Cable Television Association (NCTA) (1976–1984)
Meredith Attwell Baker	FCC Commissioner 2009–2011	President and CEO of the CTIA (2014–2015) Director of Congressional Affairs at the CTIA (1998–2000)
Robert M. McDowell	FCC Commissioner (2006–2013)	Partner in Wiley Rein Law firm, Telecom practice (2014–2016) Cooley LLP, now Chair of global communications (2016–present) Senior Vice President and Assistant General Counsel of the Competitive Telecommunications Association (1999–2006) VP & General Counsel America's Carriers Telecommunications Association (ACTA) 1998–1999
Julius Genachowski	FCC Chair (2009–2013) FCC Commissioner (2006–2009)	Partner & Managing Director in global technology, media, and telecom investments at the Carlyle Group (2014–2024) Senior advisor (2024 to present) Board of Directors Sonos Inc (2013–2023, President BOE 2023 to present) Board of Directors Sprint (2015–2020)
Jonathan S. Adelstein	FCC Commissioner (2002–2009)	President & CEO, PCIA, now the Wireless Infrastructure Association (2012–2022)
Kevin J. Martin	FCC Chair (2005–2009) FCC Commissioner (2001–2005)	Interim Head then VP, U.S. Public Policy, Meta/Facebook (2015–present) Partner, Squire Patton Boggs LLP, coleader of Telecom practice group (2009–2015) Partner at Wiley Rein in communications, legislative, and appellate litigation matters (1998–2001)
Kathleen Q. Abernathy	FCC Commissioner (2001–2005)	Board of Directors, DISH Network (2019–present) BAI Communications (2020–2024) Frontier Communication, Board of Directors (2006–2010) then Chief Legal Officer and Executive Vice President (2010–2016)
Michael K. Powell	FCC Chair (2001–2005) FCC Commissioner (1997–2001)	President and CEO of the NCTA (2011–2025 Retirement)
William E. Kennard	FCC Chair (1997–2001) FCC General Counsel (1993–1997)	AT&T Board Lead Independent Director (2025–present) AT&T Board Chair (2021–2025) AT&T Board (starting 2014)

Dunn before serving as FCC General Counsel. At the FCC, he was a counsel of record on the FCC's brief against EHT et al. and penned two pivotal FCC statements of interest siding with industry in both the Berkeley cellphone right-to-know case and other litigation centering on consumer awareness of cell phone radiation exposures (220, 221). He then left the FCC to work at Wiley Rein, co-authoring a memo for the CTIA opposing petitions in Massachusetts that would have required routine RFR audits for cell towers, RFR mitigation measures for devices, and educating schoolchildren (308). This revolving-door advocacy illustrates a key strategy detailed in Alster's *Captured Agency* report: the use of aggressive legal tactics by industry to suppress consumer safety initiatives and undermine local regulatory efforts (295).

Studies continue to find that industry-sponsored research is less likely to conclude adverse effects from non-ionizing EMF exposure, while independently funded studies more often report health effects (28, 309–315), mirroring historical patterns seen in other industries such as tobacco, lead, and chemicals (295, 316, 317). This, combined with heavy lobbying, political contributions, and well-funded public relations campaigns, maintains the inaccurate narrative of a scientific consensus on wireless safety (295, 318, 319). Thus, industry can pursue an unrestrained agenda to proliferate wireless networks, unchecked for safety.

What reforms are needed to address regulatory gaps?

The existing regulatory vacuum can be addressed by common-sense reforms to bring the U.S. regulatory framework into the 21st century so that it reflects current science, modern usage patterns, occupational exposures, and the realities of cumulative exposures from multiple wireless devices and technologies. Robust oversight and enforcement is critical, and updated policies should address both human and ecological health as they are inextricably intertwined. Recommendations to address regulatory deficiencies include:

Gap: A lack of agency activities investigating human health effects of wireless technology

Reform: Reinvigorate national research.

1. Reinstate a comprehensive national EMF bioeffects research program across key federal agencies with annual reporting.
2. Ensure a thorough ongoing review of the scientific evidence, paired with targeted research activities to address critical data gaps and evaluate industry involvement.
3. Reestablish an interagency group to coordinate among federal agencies.
4. Expand research to encompass all artificial non-ionizing frequencies, including powerlines, charging systems, wireless power transfer, LED systems, satellite systems, and mmWave -THz bands associated with emerging technologies.

Gap: Human exposure limits are only designed to protect against short-term heating related effects.

Reform: Revise limits with an evidence-based approach that protects for effects of non-heating and long-term effects.

1. Update exposure limits using quantitative risk assessments grounded in current scientific research to address adverse biological effects, including those from cumulative and long-term low-intensity exposures, applying an ecosystem-based approach.
2. Address signal characteristics (such as modulation) and exposure parameters (environment, metal, etc.) beyond frequency and intensity.
3. Apply safety margins sufficiently protective for children, different developmental and medical sensitivities, ensuring safety factors consistent with limit-setting practices used for toxic and carcinogenic exposures.
4. Conduct periodic, independent scientific reviews of regulations through a transparent science-based process led by public health and environmental agencies.

Gap: No data gathering on exposures or effects.

Reform: Establish national surveillance programs.

1. Measure and monitor EMF levels, prioritizing sensitive areas like schools and conservation areas, with publicly accessible data dashboard.
2. Establish a comprehensive post-market medical, health, and environmental surveillance and reporting program for consumer devices (phones, computers, etc.) and infrastructure (cell towers, 5G, etc.).

Gap: Premarket and post-market compliance processes lack oversight and do not reflect real-world usage patterns, conditions, or users.

Reform: Modernize oversight and compliance

1. Require rigorous premarket safety testing for all new wireless technologies, considering human and wildlife impacts.
2. Update cell phone and device compliance testing procedures to reflect real-world exposure, including direct contact use, multiple devices/networks functioning at once, and account for various environmental conditions.
3. Perform routine audits of emissions from networks and devices with enforcement measures.
4. Update and standardize RF compliance procedures and reporting for network infrastructure and develop oversight procedures to ensure recommended remediation is completed and that methodologies and measurement tools are empirically validated.

Gap: A lack of transparency regarding infrastructure/device emissions and agency activities

Reform: Ensure publicly accessible information

1. Develop a national registry and database of all existing and proposed wireless infrastructure installations (towers, 4G, 5G, etc.), including permitting and RF compliance data.
2. Launch an easy-to-use online website with mapping tools to host RF measurements and registry information.
3. Ensure RF complaints to the FCC and the agency's response are publicly available.
4. Update the FCC's authorization site platform so that the general public can more easily navigate RF data.

Gap: A lack of consumer awareness

Reform: Inform the public on exposures and measures to reduce exposure

1. Require RF and EMF exposure labeling on all wireless devices and electronics (including charging cables) along with clear instructions on mitigating exposure at the point of sale and packaging.
2. Provide robust public health agency guidance on minimizing exposure from all emitting devices, including cell phones, baby monitors, speakers, printers etc., as well as how to use safer alternatives such as Ethernet and corded connections rather than Wi-Fi and Bluetooth.

Gap: No safeguards to mitigate risk to children and vulnerable groups

Reform: Implement measures to reduce exposures in sensitive areas.

1. Prioritize wired networks, rather than wireless.
2. Issue robust guidance to institutions and local governments on reducing RF exposure for infrastructure and land use planning, as well as in building networks and devices.
3. Prohibit wireless infrastructure on or near schools, daycares, and critical wildlife habitats.
4. Mitigate day care and school exposures (e.g., replacing Wi-Fi with Ethernet and cell phones powered off)

5. Ensure accommodations are implemented in workplaces, educational institutions, public spaces, and residential areas as recommended by medical providers.

Gap: No oversight or research focused on occupational exposures.

Reform: Safeguard workers with a robust occupational RF/EMF protection program.

1. Establish a comprehensive occupational RF & EMF protection program.
2. Evaluate exposures in broad range of exposed occupations, from telecom, plastic industry, welding, utilities, healthcare, military, to retail and education.
3. Implement medical surveillance, cumulative exposure tracking, and reporting channels.
4. Provide robust employer/worker training.
5. Develop workplace-specific protocols regarding on-site measurements, cumulative exposure tracking, and required risk mitigation with enforcement mechanisms.
6. Include medical and pregnancy-specific protections such as modified duties, exposure minimization, and clear risk communication.
7. Ensure accommodations for the medically vulnerable and persons with implants.

Gap: A lack of safer technology consumer options and research

Reform: Support research, innovation, and safer alternatives.

1. Fund research on no/low EMF technology design.
2. Provide economic incentives for industry.
3. Ensure safer options are available to consumers. For example, require a plug-and-play option to connect devices with cables and Ethernet instead of wireless.
4. Require manufacturers and developers to show they have researched and integrated EMF reduction strategies in technologies brought to market and network deployment.
5. Consider a federal certificate program for no/low EMF technology and spaces.

Gap: Limits were not designed for flora or fauna

Reform: Develop a regulatory framework to protect wildlife and habitat.

1. Establish science-based, species-specific exposure limits to protect wildlife from chronic, low-level non-ionizing EMF.
2. Update compliance procedures to include flora and fauna exposure.
3. Update NEPA procedures with processes that ensure thorough evaluation of cumulative RF effects on ecosystems including vulnerable species like pollinators.
4. Designate low-to-no-EMF zones and setback requirements near conservation areas, migratory corridors, wetlands, and ecologically sensitive areas.
5. Measure and monitor EMF in parks, forests, and other ecologically sensitive zones.

This is a brief summary, as a more comprehensive review and recommendations on protecting wildlife is discussed in a related paper in this Frontiers on Public Health Special Edition, co-authored by TS (320).

Discussion and conclusion

What has emerged from this review is a profound failure of governance, with the U.S. as an exemplar of regulatory gaps. While wireless technologies are rapidly advancing to 5G and beyond, U.S. regulatory oversight has failed to keep pace. The current regulatory framework governing wireless technology in the U.S. is outdated, fragmented, and heavily influenced by industry. Assumptions that federal safety limits are current and science-based are inaccurate, as today's guidelines are based on decades-old research, obsolete/incomplete test methods, and a landscape marked by a near-total absence of civilian research, oversight, and enforcement activity (10). Given the ubiquity of wireless in modern workplaces, the lack of a comprehensive occupational RFR/EMF program, exposure research, and medical surveillance represents a serious gap. This issue should command newfound attention.

The existing research paralysis has led to significant regulatory deflection and abdication. Local and state officials defer to federal agencies. Federal agencies defer to one another. Yet, there has not been an evaluation of *all* the scientific evidence regarding the health effects of wireless technologies despite major technological changes and an ever-growing body of science. Agencies that policymakers expect to have studied the issue simply have not done so.

The result is that U.S. regulations exist without an up-to-date review. Exposure limits are based only on protecting short-term exposures, ignoring the realities of today's long-term cumulative exposure and complex modulations and signaling characteristics reported as important variables. Nothing has changed since 2002, when the EPA wrote that "…federal health and safety agencies have not yet developed policies concerning possible risk from long-term, non-thermal exposures" (321).

To rectify the current situation, government oversight must balance industry power. A strong regulatory framework must be built that rests on transparency and robust evidence-based evaluation, free of industry influence. Prevention is the cornerstone of public health, and the U.S. needs to move toward a risk mitigation approach.

Advancing regulatory reforms is not just a matter of good governance but an ethical imperative. The consequences of ignoring the growing science on non-thermal impacts could be severe, not only in for irreversible health impacts, but also for economic impacts, worker productivity, educational outcomes, and environmental damage. The U.S. should take a leadership role in technology safety by putting children, vulnerable groups, and environmental protection at the center of our decision-making process.

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Supplementary material

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POLITICS

How an AM radio station in California weathered the Trump administration's assault on media

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BY BYRON TAU
Updated 8:29 AM EST, December 15, 2025

Before Jimmy Kimmel, there was KCBS.

Just six days into President Donald Trump's new administration, the San Francisco Bay-area radio station KCBS-AM reported that immigration agents were in the area — driving "unmarked vehicles including a black Dodge Durango, a gray Nissan Maxima and white Nissan truck."

The brief story — also reported by other outlets — quickly drew the ire of conservative influencers who attacked KCBS' report as endangering agents' lives, sparking a deluge of complaints from listeners and callers.

That was just the start of KCBS' troubles. The Trump administration's top broadcast regulator, Brendan Carr, soon accused KCBS of failing to operate in the public interest and said he was opening an investigation.

By targeting KCBS, Carr revealed his willingness to expand the Republican administration's offensive on perceived media foes beyond major broadcasters like ABC, CBS and NPR. In KCBS' case, the radio station took steps to mitigate the potential of drawing further attention from conservative influ[illegible] Carr, the chairman of the Federal Communications Commission, according to eight current and f[illegible] station employees who insisted on anonymity out of fear of reprisal.

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KCBS demoted a well-liked anchor and dialed back on political programming, people said. For months, reporters were dissuaded from pursuing political or controversial topics and instead encouraged to focus on human interest stories, according to the current and former staffers.

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A timeline of Trump's fights with media, including the BBC and Jimmy Kimmel

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FCC leader says agency is no longer independent as he's grilled by Democrats over Kimmel controversy



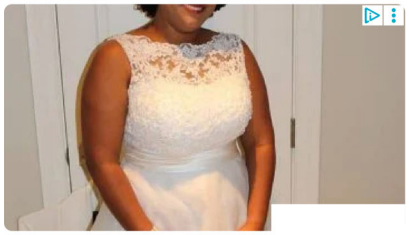
An eventful first week in his job for CBS News' Tony Dokoupil, maybe not as intended

When journalists were given permission to pursue politics or Trump administration policies, some of the staffers said, the tone of the stories was heavily scrutinized.

Doug Sovern, a veteran political journalist at the station, said he was sidelined after Carr announced the investigation.

"'Chilling effect' does not begin to describe the neutering of our political coverage," said Sovern, who retired in April. He said his retirement was not related to the controversy.

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FCC scrutiny has eased in recent months, and the station has been increasingly willing to tackle more topics that might draw attention from the administration and conservative critics, the staffers said. The station, for example, assigned a reporter in October to cover the No Kings Day protests of the Trump administration, which the staffers described as a welcome change.

In a statement, KCBS said it would not "comment on internal personnel matters."

"There has been no change in policy or editorial direction at KCBS," the station added. "We remain committed to providing our Bay Area listeners with trusted news, including our political coverage, that is balanced and objective."

The FCC did not respond to a request for comment.

Trump's enforcer

In Trump's second term, Carr has emerged as a top enforcer of Trump's agenda, using his perch to take on one of the president's favorite targets: media outlets.

His threat to ABC in September that "we can do this the easy way or the hard way" led to Kimmel, a late-night host and comedian, being briefly pulled off the air by parent company Disney over statements in one of his monologues about the political reaction to the slaying of Charlie Kirk, a conservative activist. ABC and CBS settled what some experts said were long-shot libel lawsuits by Trump at the same time their parent companies had significant interests before the FCC. NPR and PBS affiliates came under scrutiny over whether they were crossing the line into commercial advertising.

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When the FCC later approved a merger involving CBS' parent company, the network's new owners committed to making "significant changes" at the broadcast network — a move the FCC chairman praised in his statement approving the deal. And in November, Carr reshared a Trump social media post that called for comedian Seth Meyers to be fired from NBC.

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Al Sikes, a Republican former FCC chairman who served under President George H.W. Bush, said Carr was using "mobster" tactics.

"What we're seeing right now is new boundaries that are being set on the exercise of authority: punishing those that you don't like and ensconcing those that you do," Sikes said in an interview.

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ABC, NBC, CBS, PBS and NPR did not respond to requests for comment.

Since February, the White House has blocked The Associated Press' access to events after the wire service said it would continue referring to the Gulf of Mexico in some of its copy. Trump had signed an executive order renaming the body of water the Gulf of America. The AP filed suit over the restrictions, and a federal judge ordered the White House in April to restore the AP's full access to cover presidential events as part of the press pool. The judge's order was put on hold while the White House appeals it.

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KCBS in the crosshairs

KCBS has a storied history. It was one of the earliest radio stations ever licensed. Owned by CBS for nearly 70 years, it helped pioneer the 24-hour news radio format. CBS sold its radio properties in 2017 to Entercom, which later renamed itself Audacy. KCBS remains a broadcast affiliate of CBS News Radio.

The proliferation of digital content has hit the radio industry hard. Audacy recently survived Chapter 11 bankruptcy and had only been saved by a major investment from a firm owned by Geor[illegible], a liberal donor and frequent Republican target. That investment was approved by the FCC unde[illegible] President Joe Biden's Democratic administration. Some conservatives, including Carr, had criticized th[illegible] previous FCC leadership for failing to scrutinize the deal more closely.

In going after KCBS, Carr relied on a letter of inquiry, the first formal step in opening an [illegible] investigation. Broadcasters are regulated by the agency, and it has the authority to issue admonitions, [illegible] cases, it can revoke broadcast licenses.

After Carr's threat, staffers involved in the story were summoned to meetings with lawyers hired by Audacy. The attorneys scoured employee social media posts and grilled some on whether they had any political bias, current and former staff said.

The station's news director, Jennifer Seelig, sits on the board of the Radio Television Digital News Association, which gives out a prominent First Amendment award. She told people that business considerations required the station to avoid angering the FCC, current and former staffers said.

Seelig did not respond to requests for an interview.

Veteran reporter demoted

Bret Burkhart, who first read the report on the immigration action over the air, was demoted from his anchor position to a less prestigious reporting gig. After a few months, he left the station for a new job, according to current and former staffers. Burkhart was a well-regarded Bay Area radio personality, with more than a dozen top journalism awards over the course of his long career.

Burkhart's colleagues were perplexed that the station would discipline anyone for reporting on the raids, especially because the federal agents were not operating undercover and the information they based the report on came from several local politicians.

The description of immigration agents in unmarked cars "is newsworthy, particularly since Trump's administration has a history of sending in federal agents while disguising what agencies they're with," said Mark Feldstein, a journalism professor at the University of Maryland and former on-air correspondent at CNN and ABC.

Sovern, an award-winning political reporter who worked for The New York Times and the AP, said he struggled to get stories published.

In the weeks after the immigration story, Seelig asked Sovern to cancel an interview he had set up with California gubernatorial candidate Katie Porter out of fear she would say something negative about Trump, he said.

"I'm disappointed that a news organization once renowned and acclaimed for its diligent pursuit of the truth, no matter where it led and no matter whose feathers it ruffled, backed away from its core mission out of fear and economic insecurity," Sovern said. "That's not the KCBS I knew, and gave 35 years of my professional life to, and it's a shame the last months had to end in such ignoble fashion."

AP writers Brian Slodysko and Michael Biesecker contributed reporting.

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NEWS AND COMMENTARY

Democrats Want Feds To Block Miami Latinos From Hearing Conservative Radio

"What better way to reassure Hispanics in South Florida that Democrats are totally not like the regimes they fled than to summon the full power of the federal government against a privately-held opposition media outlet?"

By Luke Rosiak

Apr 16, 2021 DailyWire.com

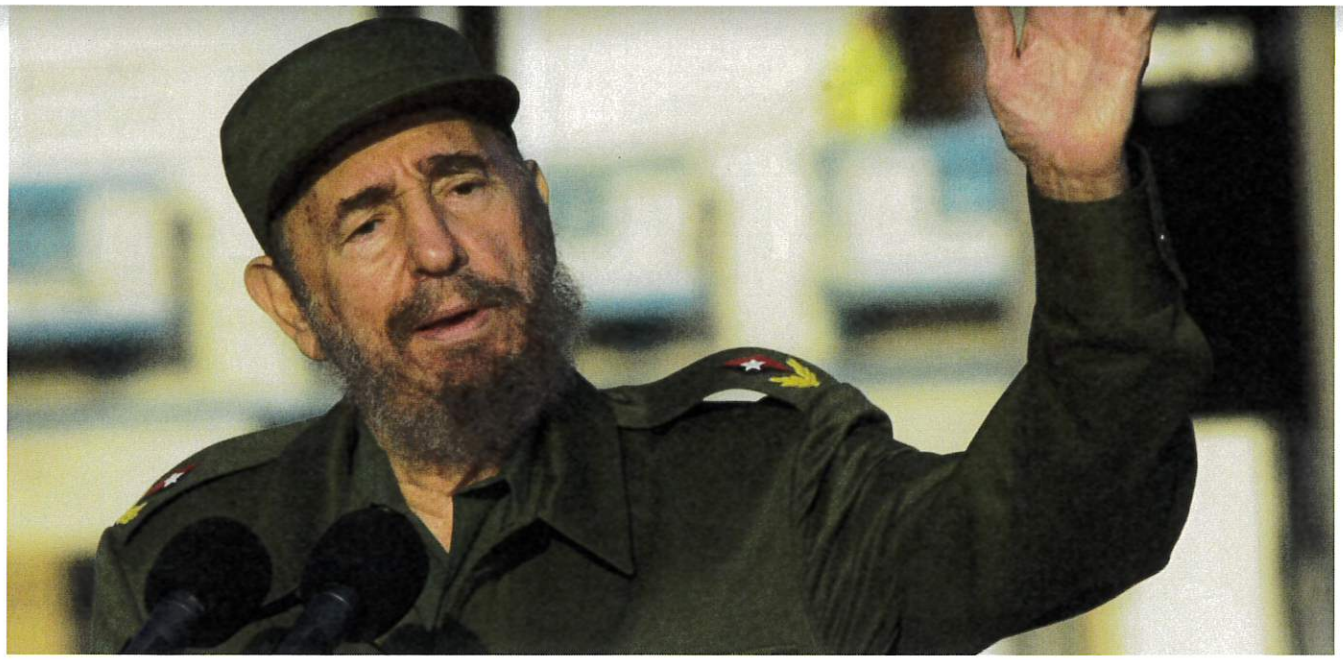
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Jorge Rey/Getty Images

After Republicans increased their share of the Hispanic vote in 2020, Congressional Democrats are clamoring to use the force of government to prevent Latinos from hearing conservative ideas.

Multiple members of the Congressional Hispanic Caucus (CHC), including Rep. Ruben Gallego (D-AZ), the chair of its political arm, want the Federal Communications Commission (FCC) to block the sale of a Miami Spanish-language radio station to a company they believe will move its programming from a left-wing to a right-wing slant.

America CV, a Spanish-language media company, announced that it was buying Caracol 1260 AM this month. Soon after, it said it would change the station's name to America Radio and replaced Raul Martinez, a liberal talk show host and former government official, Newsweek reported.

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will not apologize for promoting democracy and opposing the Castro regime because we represent a community who are victims of that regime."

Gallego lamented that Hispanics might vote Republican since those who preferred to consume media in the Spanish language did not watch CNN.

"For a lot of these communities this is the only source they watch, a lot of them aren't crossing over and watching other media like CNN, so they end up being siloed in terms of the information they get. They only go to the trusted source so when that source gets corrupted, you essentially have a population getting one point of view," he told Newsweek.

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The two best-known sources of Spanish-language news, Univision and Telemundo, already provide a notoriously leftist viewpoint. Univision this month described moves towards Democrats' scorched-earth plan to pack the supreme court as Joe Biden "keeping his campaign promise to unite a divided nation."

Gallego asked the broader CHC to support his bid to ask the FCC to block the transfer. Rep. Joaquin Castro (D-TX) told Newsweek it would be "wise" for the FCC to look at the sale.

But Jorge Bonilla, director of MRC Latino, a watchdog group that focuses on Hispanic media, said the use of government powers to silence


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"What better way to reassure Hispanics in South Florida that Democrats are totally not like the regimes they fled than to summon the full power of the federal government against a privately-held opposition media outlet? Hugo Chávez would be proud," he told The Daily Wire.

Rep. Darren Soto, a Florida Democrat, implied that Hispanics voted Republican because they had been tricked by Spanish-language media, telling Newsweek the sale "could further make South Florida vulnerable to the sophisticated Spanish-language misinformation campaigns perpetrated during the 2020 election. The 'Big Lie' about the 2020 elections, which was amplified on similar stations, has damaged this country severely already."

"The FCC should scrutinize this sale," he said.

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Florida is a swing state with an electorate that is approximately 19% Hispanic. Cuban-Americans, many of whom saw the effects of far-left politics first-hand under the Fidel Castro regime, have long been a strong conservative presence.

Many voters from Latin American countries beyond Cuba increasingly


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Those include Americans with heritage in Nicaragua, which was the site of the Sandanista revolution; Venezuela, whose economy has cratered under socialism; and Colombia, which is a conservative-leaning country that endured Marxist guerrillas for decades.

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Miami-Dade County, which is 69% Hispanic, voted for Democrat Hillary Clinton by 30 points in 2016 but went for Democrat Joe Biden by a margin of only 7 points in 2020.

Martinez, the talk show host who was a reliable voice for progressive messages and who was fired, had a trail of allegations that might feel familiar to those fleeing corrupt countries.

As mayor of the city of Hialeah, a heavily Hispanic blue-collar municipality outside of Miami, in the 1980s and 1990s, Martinez's campaign workers "recruited mentally incapacitated people to cast absentee ballots," the Sun-Sentinel reported. He was convicted of racketeering and extortion in 1991, but the convictions were later overturned.

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blows to the body" as a police officer restrained the mayor, the Sun-Sentinel reported. Prosecutors dropped charges.

Though Hispanics are America's largest minority group and come from countries with a wide variety of cultures and beliefs, the Congressional Hispanic Caucus (CHC), a nominally nonpartisan group for lawmakers of that ethnic background, consists of only Democrats.

In 2017, the CHC refused to allow Rep. Carlos Curbelo, a Miami-area lawmaker who was the son of Cuban exiles and "advocated on behalf of undocumented immigrant youth," to join. Curbelo is a Republican.

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The CHC said at the time that it "isn't just an organization for Hispanics; it is a caucus that represents certain values. This vote reflects the position of many of our members that Rep. Curbelo and his record are not consistent with those values."

Curbelo replied, "I will not allow their bigotry and discrimination and penchant for segregation to hurt the young people they claim they want to help and I certainly want to help."

CHC spokesperson Alex Sarabia did not immediately return questions from The Daily Wire on its current criteria for membership, and how an all-Democrat Hispanic Caucus can faithfully represent Hispanic-Americans with diverse beliefs. She also did not reply to a question about


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A mismatch between ethnic groups and the megaphones that purport to speak for them has increasingly been on display.

In California in 2020, prominent nonprofits ostensibly representing Hispanics backed Proposition 16, a ballot initiative that would legalize affirmative action, even as polling showed that most individual Hispanics did not support it. All of California's majority-Hispanic counties ultimately voted against it at the ballot box, and the measure failed.

The same tension has been evidenced with Asians. A group called Chinese for Affirmative Action (CAA) aggressively promoted Proposition 16 even though Asians could be the primary losers of such a measure, with their admission to prestigious universities being sharply curtailed.

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Polling showed that Asian voters helped defeat the proposition. An anti-Prop 16 activist, Wenyuan Wu, likened CAA to an astroturf group that "advances the ideological agenda of the groups behind the initiative."

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Environmental Health

COMMENT

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Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation: implications for 5G

International Commission on the Biological Effects of Electromagnetic Fields (ICBE-EMF)*

Abstract

In the late-1990s, the FCC and ICNIRP adopted radiofrequency radiation (RFR) exposure limits to protect the public and workers from adverse effects of RFR. These limits were based on results from behavioral studies conducted in the 1980s involving 40–60-minute exposures in 5 monkeys and 8 rats, and then applying arbitrary safety factors to an apparent threshold specific absorption rate (SAR) of 4 W/kg. The limits were also based on two major assumptions: any biological effects were due to excessive tissue heating and no effects would occur below the putative threshold SAR, as well as twelve assumptions that were not specified by either the FCC or ICNIRP. In this paper, we show how the past 25 years of extensive research on RFR demonstrates that the assumptions underlying the FCC's and ICNIRP's exposure limits are invalid and continue to present a public health harm. Adverse effects observed at exposures below the assumed threshold SAR include non-thermal induction of reactive oxygen species, DNA damage, cardiomyopathy, carcinogenicity, sperm damage, and neurological effects, including electromagnetic hypersensitivity. Also, multiple human studies have found statistically significant associations between RFR exposure and increased brain and thyroid cancer risk. Yet, in 2020, and in light of the body of evidence reviewed in this article, the FCC and ICNIRP reaffirmed the same limits that were established in the 1990s. Consequently, these exposure limits, which are based on false suppositions, do not adequately protect workers, children, hypersensitive individuals, and the general population from short-term or long-term RFR exposures. Thus, urgently needed are health protective exposure limits for humans and the environment. These limits must be based on scientific evidence rather than on erroneous assumptions, especially given the increasing worldwide exposures of people and the environment to RFR, including novel forms of radiation from 5G telecommunications for which there are no adequate health effects studies.

Keywords: Federal Communications Commission (FCC), International commission on non-ionizing radiation protection (ICNIRP), Radiofrequency radiation (RFR), Exposure limits, Exposure assessment, Radiation health effects, Reactive oxygen species (ROS), DNA damage, 5G, Scientific integrity, Cell phone*, Mobile phone*

Introduction

In establishing exposure limits for toxic or carcinogenic agents, regulatory agencies generally set standards that take into account uncertainties of health risks for the general population [1] and for susceptible subgroups such as children [2]. That approach has not been applied in the same way to the setting of exposure limits for

*The terms cell phone and mobile phone are used interchangeably in this commentary; cell phone is the term used in the United States, while mobile phone is the term used in most of Europe.

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radiofrequency radiation (RFR) (frequency range: 3 kHz to 300 GHz). Moreover, assumptions underlying the current RFR exposure limits are flawed; hence, the limits that are currently applied do not adequately protect human and environmental health. This issue is discussed in greater detail under Assumption #9.

The Federal Communications Commission's (FCC) limits for maximum permissible exposure to RF electromagnetic fields (EMF) [3] were established in 1996 [4], and currently include many recommendations from the International Commission on Non-Ionizing Radiation Protection [5]. These exposure limits were expected to protect against adverse health effects in humans that might occur from short-term (i.e., acute) exposures to RFR and have been maintained by the FCC for the past 26 years. The exposure limits that were established by the FCC in 1996 relied on criteria recommended by the National Council on Radiation Protection & Measurements (NCRP) [6] and the Institute of Electrical and Electronics Engineers (ANSI/IEEE) [7, 8]. The limits were "based on a determination that potentially harmful biological effects can occur at a SAR (specific absorption rate) level of 4.0 W/kg as averaged over the whole-body." The SAR is a measure of the rate of RF energy absorbed per unit mass.

The threshold for a behavioral response and for acute thermal damage in sensitive tissues was considered to be an exposure that produced a whole-body SAR greater than 4 W/kg. In parallel with the development of the FCC's RFR exposure limits, ICNIRP's guidelines for limiting exposure to RF-EMF were also based on behavioral studies conducted in rats and monkeys in the 1980s [9].

The harmful effects that served as the basis for the exposure criteria were changes in behavior observed in small numbers of rats and monkeys when exposed to RFR for up to 60 minutes to power densities at which the whole-body SAR was approximately 4 W/kg or higher [10, 11]. Those studies were conducted in the early 1980s (1980 and 1984, respectively) by investigators of the US Navy Department. Consequently, 4 W/kg was identified as the threshold SAR for adverse health effects induced by RFR. In food-deprived monkeys that were exposed to three different frequencies (225 MHz, 1.3 GHz, and 5.8 GHz) during 60-min sessions, lever-pressing response rates for the delivery of food pellets were reduced compared to sham exposure sessions. The threshold SAR for this decreased response was reported to range from 3.2 to 8.4 W/kg [11]. Similarly, in food-deprived rats exposed to 40-min sessions at 1.28 or 5.62 GHz radiation, the threshold SAR for a decrease in response rate was reported to range from approximately 3.8 to 4.9 W/kg [10]. In experimental studies in which monkeys were exposed in an anechoic chamber for 4 hours to 1.29 GHz radiation at various power densities, an increase in mean body temperature of 0.7 °C was associated with a whole-body SAR of 4 W/kg [12]. Behavior disruption associated with an increase in body temperature of approximately 1.0 °C was assumed to be the most sensitive measure of harmful effects from RF-EMF exposure.

After establishing 4 W/kg as the threshold dose for acute harmful effects, both the FCC [3, 4] and ICNIRP [5, 9] set exposure limits for controlled occupational exposures to 0.4 W/kg SAR averaged over the whole body (based on applying a 10-fold safety/uncertainty factor). For the general population, the FCC's and ICNIRP's exposure limits were set at 0.08 W/kg SAR averaged over the whole body (by applying an additional 5-fold safety/uncertainty factor) for frequencies between 3 MHz and 3 GHz. The exposure limits established by the FCC and ICNIRP do not account for any impact of differing signal characteristics, such as carrier wave modulations or pulsing of the signal. Whole-body exposures for the general population are based simply on power levels averaged over 30-minute periods [3, 5].

Based on SAR distributions from whole-body exposures in which local (i.e., partial body) SARs were estimated to be 10 to 20 times the average value, local exposure limits were set 20 times higher than the average whole-body exposure limit [4–7]. For occupational exposures, local peak exposure limits were permitted up to 8 W/kg averaged over any 1-g cube of tissue [4] or 10 W/kg averaged over any 10 g of contiguous tissue [9] by the FCC and ICNIRP, respectively. For the general population, local peak SARs for partial-body exposures were not to exceed 1.6 W/kg averaged over any 1 g of cube-shaped tissue [3], or not to exceed 2.0 W/kg averaged over any 10 g of cube-shaped tissue [5]. Higher limit values are permissible for extremities. Extremities include the hands, wrists, feet, ankles, and pinnae (the external part of the ear), despite the close proximity of the ear to the brain. These adjustments were made long before the widespread use of wireless communication devices in which the emitting antenna is typically held close to local body organs such as the brain. The NCRP document [6] acknowledges that exposures could be greater than the recommended safety limit values when people are in close proximity to emitters of RFR.

The setting of exposure limits for the prevention of excessive tissue heating was based on the following assumptions: 1) electromagnetic waves at frequencies used in wireless communications do not have sufficient energy to break chemical bonds or ionize molecules [13]; 2) RFR could not damage DNA; and 3) tissue heating was the only possible biological effect of nonionizing radiation [5, 9, 14–16]. For potential environmental and human health issues that are not addressed in the

A) Effects of RF radiation at exposures below the putative threshold SAR of 4 W/kg

Assumption 1) There is a threshold exposure for any adverse health effect caused by RF radiation; in the frequency range of 100 kHz to 6 GHz it is a whole-body exposure that exceeds an SAR of 4 W/kg. Any biological effect of RF radiation above the threshold exposure is due to tissue heating.

Assumption 2) RF radiation is incapable of causing DNA damage other than by heating; there is no mechanism for non-thermal DNA damage.

Assumption 3) Two to seven exposures to RF radiation for up to one hour duration are sufficient to exclude adverse effects for any duration of exposure including chronic exposures.

Assumption 4) No additional effects would occur from RF radiation with co-exposure to other environmental agents.

B) Factors affecting dosimetry

Assumption 5) Health effects are dependent only on the SAR value; carrier wave modulations, frequency, or pulsing do not matter except as they influence the SAR.

C) Human brain cancer risk

Assumption 6) The multiple human studies that find associations between exposure to cell phone RF radiation and increases in brain cancer risk are flawed because of biases in the published case-control studies, and because brain cancer rates have remained steady since the time that use of wireless communication devices became widespread.

D) Individual variations in exposure and sensitivity to RF-EMF

Assumption 7) There are no differences among individuals, including children, in the absorption of RF-EMF and susceptibility to this radiation.

Assumption 8) There are no differences among individuals in their sensitivity to RF radiation-induced health effects.

E) Applied safety factors for EMF-RF workers and the general population

Assumption 9) A 50-fold safety factor for whole body exposure to RF radiation is adequate for protecting the general population to any health risks from RF radiation.

Assumption 10) A 10-fold safety factor for whole body exposure to RF radiation is adequate for protecting workers to any health risks from RF radiation.

Assumption 11) Exposure of any gram of cube-shaped tissue up to 1.6 W/kg, or 10 grams of cube-shaped tissue up to 2 W/kg, (duration not specified) will not increase the risk of that tissue to any toxic or carcinogenic effects in the general population.

Assumption 12) Exposure of any gram of cube-shaped tissue up to 8 W/kg, or 10 grams of cube-shaped tissue up to 10 W/kg, (duration not specified) will not increase the risk of that tissue to any toxic or carcinogenic effects in workers.

F) Environmental exposure to RF radiation

Assumption 13) There is no concern for environmental effects of RF radiation or for effects on wildlife or household pets.

G) 5G (5^{th} generation wireless)

Assumption 14) No health effects data are needed for exposures to 5G; safety is assumed because penetration is limited to the skin ("minimal body penetration").

Fig. 1 Assumptions Underlying the FCC/ICNIRP Exposure Limits for RF Radiation

setting of exposure limits (for example effects of chronic exposures, or effects of co-exposure of skin to RFR and other environmental agents, such as would occur with 5G exposure in combination with sunlight), the implicit assumption is that such effects do not matter, or that the arbitrarily selected safety/uncertainty factor is sufficient to deal with those concerns. In any case, it is expected that underlying assumptions applied to health risk assessments would be clearly described [1].

Exposure limits for RF radiation are based on numerous assumptions; however, research studies published over the past 25 years show that most of those assumptions are not supported by scientific evidence. In the NCRP report [6], the authors noted that when further understanding of biological effects of RF radiation becomes available, exposure guidelines will need to be evaluated and possibly revised. The ANSI/IEEE document [7] also notes that effects of chronic exposure or evidence of non-thermal interactions could result in revising exposure standards. Unfortunately, these recommendations were never implemented. Assumptions of safety from exposures that could adversely affect human or environmental health should be tested and validated *before* widespread exposures occur, not afterwards, by agencies responsible for protecting public health.

In this paper, we highlight studies that demonstrate the fallacy of inherent assumptions in the FCC/ICNIRP guidelines for RF radiation exposure limits, and we find that the limits fail to protect human and environmental health. Fourteen assumptions that underlie the RFR exposure limits established in the 1990s and reaffirmed in 2020 by the FCC [4, 5] and ICNIRP [5, 9] are addressed in this paper and are shown in Fig. 1.

Assumptions underlying exposure limits for RF radiation and the scientific evidence demonstrating that these assumptions are not valid

A. Effects of RF radiation at exposures below the putative threshold SAR of 4 W/kg

Assumption 1) *There is a threshold exposure for any adverse health effect caused by RF radiation; in the*

frequency range of 100 kHz to 6 GHz it is a whole-body exposure that exceeds an SAR of 4 W/kg. Any biological effect of RF radiation above the threshold exposure is due to tissue heating.

Cardiomyopathy and carcinogenicity

In response to a request from the Food and Drug Administration's (FDA) Center for Devices and Radiological Health [17], the National Toxicology Program (NTP) conducted toxicity and carcinogenicity studies of cell phone (CDMA- or GSM-modulated) radiation in rats and mice exposed to RFR at frequencies of 900 MHz and 1800 MHz, respectively [18, 19]. Exposures to RFR for up to 2 years occurred in reverberation chambers over 18 hours/day on a continuous cycle of 10 minutes on and 10 minutes off. In rats, the whole-body SAR levels during the 10-minute on cycles were 0, 1.5, 3, or 6 W/kg.

The major histopathological findings from the NTP study in male rats [18] included dose-related increases in cardiomyopathy, increased incidence of cancers and preneoplastic lesions in the heart (schwannoma and Schwann cell hyperplasia) and brain (glioma and glial cell hyperplasia), increases in prostate gland tumors and hyperplasias, significant increases in adrenal gland tumors, and significant increases in the overall incidence of benign or malignant neoplasms in all organs in the 3 W/kg groups. The incidence of cardiomyopathy was also increased in GSM-exposed female rats, and significant increases in DNA damage were found in rats and mice [18, 19]. Similarly, an earlier study by Chou et al. [20] found a significant (3.6-fold) increase in the incidence of primary malignant neoplasms in male rats exposed to 2450 MHz pulsed RFR for 25 months (21.5 hr./day) at an SAR that ranged from 0.15 to 0.4 W/kg.

A 3-day external peer-review of the NTP studies confirmed there was "clear evidence of carcinogenic activity" in male rats for heart schwannomas, and "some evidence of carcinogenic activity" for brain gliomas and adrenal gland tumors with exposure to either GSM- or CDMA-modulated RF radiation [21]. In addition, a lifetime study by the Ramazzini Institute reported a significant increase in heart schwannomas in male rats exposed 19 hour/day to 1800 MHz GSM-modulated RFR at a field strength of 50 V/m, equivalent to a whole-body SAR of 0.1 W/kg [22]. The incidence of heart Schwann cell hyperplasia was also increased in that exposure group. These findings are consistent with results from the NTP study and demonstrate that the proliferative effect of modulated RFR in heart Schwann cells is a reproducible finding that can occur at doses far below the assumed whole-body threshold SAR of 4 W/kg.

ICNIRP [23] dismissed the evidence of carcinogenicity for RFR that was provided in the studies by the NTP [18] and the Ramazzini Institute [22] based on their earlier critique of those studies [24]. However, that critique demonstrated an unfortunate lack of understanding together with a misrepresentation of the design, conduct, and interpretation of experimental carcinogenicity studies in animal models [25], as well as a lack of appreciation for the remarkable concordance between the tumor responses observed in experimental animals with those identified in cancer epidemiology studies of mobile phone users described under Assumption #6.

Neither heating effects nor thermal stress was likely causal of the adverse health effects observed in the NTP [18] study, since there was no tissue damage observed in a 28-day study at the same SARs, there was no significant effect on body weight during the 2-year study, and there were no exposure-related clinical observations that would indicate thermal or metabolic stress. Furthermore, a preliminary thermal pilot study demonstrated that body temperatures did not increase by more than 1^{O} C at the exposure levels used in the chronic studies [26], and there is no evidence that a small change in body temperature associated with the RFR exposures in the NTP study can cause the types of carcinogenic effects that were observed. The similar findings of GSM-modulated RFR on Schwann cells by the Ramazzini Institute [22] at much lower whole-body SARs confirm these effects to be independent of tissue heating.

Neurological effects

Though the FCC and ICNIRP exposure limits are based on a putative threshold dose of 4 W/kg due to behavioral disruption observed at higher doses in rats and monkeys [10, 11] numerous studies have shown consistent and reproducible deficits in spatial learning and memory in laboratory animals exposed to RF radiation at SARs below 4 W/kg. Examples of study exposures that demonstrated these neurological effects included 900 MHz GSM at 0.41–0.98 W/kg, 2 hr./day for 4 days in mice [27]; 900 MHz GSM at 0.52–1.08 W/kg, 2 hr./day for 1 month in rats [28]; 900 MHz GSM at 1.15 W/kg, 1 hr./day for 28 days in rats [29]; 900 MHz pulsed RFR at 0.3–0.9 W/kg for 6 hr./day in rats from conception to birth and tested at 30 days of age [30]; 900 MHz GSM and 1966 MHz UMTS at 0.4 W/kg for 6 months in rats [31]; and 900 MHz continuous wave EMF at 0.016 W/kg 3 hr./day for 28 days in rats [32]. The studies cited above are not the only studies showing these effects, but they clearly demonstrate that exposure to RFR at an SAR of 4 W/kg is not a threshold dose for neurological effects in rodents. The effects of RF radiation on spatial learning and memory indicate

the hippocampus as a target site of these exposures. For a more complete listing of neurological effects of RFR reported between 2007 and 2017 see Lai [33].

In addition, many studies have reported changes in brain electrical activities in human subjects, measured by electroencephalography (EEG), including sleep disturbance from single exposures to cell phone RF radiation. This is not surprising since the nervous system transmits messages based on electrical signals generated by nerve cells. Decreased β-trace protein, which is a key enzyme in the synthesis of a sleep-promoting neurohormone, has been seen in young adults with high-cumulative amounts of hours of mobile phone use [34]. Another frequently reported effect of RF radiation is increased blood-brain barrier permeability in rats at SARs much lower than 4 W/kg, e.g. [32, 35–41]. Oxidative stress induced in the brain of animals exposed to RF-EMF has been associated with observed neurological effects [42]. Although many studies did not observe significant changes in neurological effects in humans and several studies did not observe increased permeability in the blood-brain barrier in animal models [33], differences in EMF frequency, modulation, duration of exposure, and direction of incident waves to the exposed subject, as well as difference in dielectric properties and the size and shape of the exposed subject likely account for differences in observed effects [43, 44].

Sperm damage

The effect of non-ionizing microwave radiation on the testis (testicular degeneration in mice) was first reported 60 years ago [45]. Since then, and with the rapid increase in use of RF-EMF emitting devices, numerous studies have investigated testicular effects of RFR and potential associations with male infertility [46–50]. Human and animal studies have shown that the testis is one of the most sensitive organs to RF-EMF exposures, and that keeping a mobile phone in trouser pockets in talk mode can affect fertility parameters e.g., sperm motility, sperm count, sperm morphology, and apoptosis [48, 51]. Meta-analyses of published epidemiologic studies on the impact of mobile phone radiation on sperm quality in adult men have found significant decreases in sperm motility, sperm viability and/or sperm concentrations that were associated with mobile phone usage [52–55]. Several physical factors associated with exposure conditions can affect the outcome of human studies, including depth of energy penetration, duration of call, type of transmission technology, distance of the device to the body or testis, and power density with defined SAR. For example, Zilberlicht et al. [56] observed higher rates of abnormal sperm concentrations among men who held their phones less than 50 cm from their groin.

The effects of RFR on reproductive parameters in humans are consistent with results from experimental studies in animals and in vitro studies. For example, exposure of human semen to 850 MHz radiation from mobile phones for 1 hour at an SAR of 1.46 W/kg caused a significant decrease in sperm viability that was associated with an increase in reactive oxygen species (ROS) [50] or an increase in sperm DNA fragmentation [57]. Exposure of isolated human spermatozoa to 1.8 GHz RF-EMF significantly reduced sperm motility and induced ROS generation at an SAR of 1.0 W/kg, and significantly increased oxidative DNA damage and DNA fragmentation at an SAR of 2.8 W/kg [58].

Some examples of effects of RFR on male fertility factors in studies with experimental animals at SARs below 4 W/kg include: a decrease in sperm count and an increase in ROS in rats exposed to mobile phone frequencies 2 hr./day, for 35 days (SAR = 0.9 W/kg) [59]; increases in oxidative stress, 8-hydroxy-deoxyguanosine (8-OHdG), and DNA strand breaks in the testes of rats exposed to 900 MHz (SAR = 0.166 W/kg), 1800 MHz (0.166 W/kg), or 2100 MHz (0.174 W/kg) 2 hr./day for 6 months [60]; an increase in ROS, a decrease in sperm count, and altered sperm morphology in rats exposed to 900 MHz 3G mobile phone radiation (SAR = 0.26 W/kg) 2 hr./day for 45 days [61]; decreased sperm quality in rats in which local exposure of the scrotum to 2575–2635 MHz 4G smartphone time division LTE radiation occurred for 1 min over 10 min intervals 6 hr./day for 150 days [62]; impaired testicular development at 35 days of age in male offspring of pregnant rats that were exposed to 2.45 GHz RFR (SAR = 1.75 W/kg) 2 hr./day throughout pregnancy [63]; decreased sperm motility in mice exposed to 905 MHz RFR (SAR = 2.2 W/kg) 12 hr./day for 5 weeks, and increased ROS formation and DNA fragmentation after 1 week of exposure [64]. Although negative studies have also been reported, it is important to remember that the outcome of experimental studies can be affected by differences in exposure conditions, including the frequency, modulation, polarization, stray electromagnetic fields, local SAR, duration of exposure, and analytical methods [43, 44].

Although the mechanism of testicular effects from exposure to non-thermal levels of RFR is not fully known, numerous studies in rats and mice, and in human sperm have found associations between negative effects on fertility parameters and increases in ROS and/or DNA damage [48, 51, 57, 58, 60, 61, 64–68]. Thus, the adverse effects of RFR on sperm quality are likely due in large part to induced generation of ROS.

Assumption 2) *RF radiation is incapable of causing DNA damage other than by heating; there is no mechanism for non-thermal DNA damage.*

In 2009, ICNIRP [16] claimed that "low energy photons of RF radiation are too weak to affect ionization or cause significant damage to biological molecules such as DNA, under ordinary circumstances." However, DNA damage and other genotoxic effects have been observed in numerous studies of low intensity RFR in animal models and in humans. For example, the NTP study found statistically significant increases in DNA damage in brain cells of exposed rats and mice compared to sham controls [18, 19, 69], and Akdag et al. [70] found statistically significant increases in DNA damage in hair cells in the ear canal among 30 to 60 year-old men who used mobile phones for 10 years for 0–30 min/day, 30–60 min/day, or greater than 60/min/day compared to people who did not use mobile phones. In the latter study, the extent of DNA damage increased with increasing daily exposure duration. In a review of published studies on genetic effects of ELF- and RF-EMF, Lai [71] listed more than 150 studies in which non-thermal exposures to RFR produced increases in DNA damage, chromosome aberrations, or micronuclei formation.

In addition, it is well established that DNA damage can also be caused by indirect processes, such as by the generation of reactive oxygen species (ROS), and numerous studies have demonstrated DNA damage at exposures below the putative threshold SAR of 4 W/kg. More than 120 published studies have demonstrated oxidative effects associated with exposure to low intensity RFR (Additional file 1: Appendix 1). An analysis of experimental studies on molecular effects of low intensity RF radiation (RFR) in biological systems found that the majority (93 of 100 studies) demonstrated the induction of oxidative effects [72]. More recent studies (from 2017) revealed that all 30 relevant publications (100%) detected significant oxidative effects under low intensity RFR exposures, and most of these studies used modulated RFR from wireless communication devices.

Increased production of ROS in living cells may be caused by weak magnetic fields altering recombination rates of short-lived radical pairs generated by normal metabolic processes leading to changes in free radical concentrations [73], or by low intensity extremely low frequency (ELF) EMFs resulting in alterations in voltage-gated ion channels in cell membranes causing changes in cation flow across membranes [74]. These mechanisms apply to both ELF-EMFs and to RFR modulated by pulsed fields at extremely low frequencies. Other biophysical mechanisms by which non-thermal RF-EMF can cause biological effects through interactions with normal cellular processes have been described [75].

Increasing NADH oxidase activity is another mechanism by which RFR can increase ROS production. NADH oxidases, which are membrane-associated enzymes that catalyze one-electron reduction of oxygen to superoxide radical using NADH as the electron donor, have been identified as primary mediators of RFR interactions in cellular systems [76]. A significant (3-fold) increase in the activity of NADH oxidase was measured in purified plasma membranes from HeLa cells exposed to 875 MHz for 5 or 10 min at a power density of 200 μW/cm^2. This exposure intensity is significantly lower than the ICNIRP [5] safety limit.

The major source of ROS in living cells is the mitochondrial electron transport chain, where leakage of electrons generates superoxide radicals due to the partial reduction of oxygen [77]. A dose-dependent effect of 1.8 GHz modulated RFR exposure (SAR = 0.15 and 1.5 W/kg) on mitochondrial ROS production was detected in mouse spermatogonial germ cells [65]. Exposure of quail embryos to extremely low intensity modulated RFR (GSM 900 or 1800 MHz, 0.25 or 0.32 μW/cm^2) during the initial days of embryogenesis resulted in a robust overproduction of superoxide radical and nitrogen oxide in mitochondria of embryonic cells [78, 79]. Thus, multiple mechanisms for the increased production of ROS by low intensity RF radiation have been demonstrated.

Numerous studies have been published on mutagenic effects of low intensity RF-EMFs, especially studies that identified increases in levels of a specific marker of oxidative DNA damage and a risk factor for cancer, 8-hydroxy-2′-deoxyguanosine (8-OHdG) [58, 60, 78–84]. For example, the level of 8-OHdG in human spermatozoa was increased significantly after in vitro exposure for 16 hr. to 1.8 GHz at a power level of 2.8 W/kg and correlated with levels of ROS generation [58]. Likewise, exposure of quail embryos *in ovo* to GSM-modulated 900 MHz of 0.25 μW/cm^2 for 1.5, 5, or 10 days was sufficient to produce a significant, two-threefold, increase in 8-OHdG levels in embryonic cells [79]. Umbilical cord blood and placenta tissue samples obtained after delivery from women who used mobile phones during pregnancy had significantly higher levels of oxidative stress parameters, including 8-OHdG and malondialdehyde, compared to cord blood and placental tissue from women who did not use mobile phones during pregnancy [85]. In addition, DNA damage, analyzed by the comet assay, was increased significantly in cord blood lymphocytes obtained from women who used mobile phones during pregnancy compared to cord blood lymphocytes obtained from women who did not use mobile phones.

As low intensity RF radiation does not have sufficient energy to ionize DNA molecules, and as increased production of ROS in living cells due to RF-EMF exposures has been reliably documented, an indirect effect of this type of radiation is the formation of oxidative damage to DNA. The most aggressive form of ROS that can cause oxidative DNA damage is the hydroxyl radical; this reactive oxygen species can be generated from superoxide radical and hydrogen peroxide [86], which may be produced in living cells exposed to low intensity RF radiation. Ultraviolet radiation (UVR, encompassing UVA, UVB, and UVC), which is classified by IARC as "carcinogenic to humans"), can also cause indirect DNA damage by generating ROS [87]. Thus, both RFR and UVR, which can similarly induce oxidative DNA damage, can increase cancer risk by a similar mechanism.

Increased production of ROS and depletion of antioxidant capacity in living cells exposed to low intensity RF radiation can result in oxidative DNA damage. Induction of oxidative stress, which is a key characteristic of many human carcinogens [88], including UVR and asbestos, can also lead to genotoxicity and carcinogenicity of non-ionizing RF radiation without causing direct DNA damage.

> **Assumption 3**) *Two to seven exposures to RF radiation for up to 1 hour duration are sufficient to exclude adverse effects for any duration of exposure including chronic exposures.*

The behavioral studies in 8 male rats and 5 male monkeys that served as the basis for the exposure limits to RF radiation adopted by the FCC and ICNIRP involved 2 to 7 exposure sessions of 40-minute duration for rats [10] and 3 exposure sessions of 60-minute duration for monkeys at each power density [11]. Additional support for the threshold SAR of 4 W/kg in the frequency range of 100 kHz to 6 GHz came from behavioral studies conducted in rats and monkeys by D'Andrea et al. [89, 90]. However, D'Andrea et al. [91, 92] also reported that exposure of rats to continuous wave 2450 MHz RFR for 14 or 16 weeks caused significant differences in behavioral activity between sham-exposed rats and RFR-exposed rats at mean SARs of 0.7 W/kg and at 1.23 W/kg, indicating that 4 W/kg is not a threshold SAR with extended exposure durations. Since that time many studies have shown that responses to non-thermal RFR depend on both exposure intensity and exposure duration [93]. Importantly, the same response was observed with lower exposure intensity but prolonged exposure duration as at higher exposure intensity and shorter duration [94].

Recognizing that the exposure limits do not address potential health effects after long-term exposures to RF radiation emitted from wireless devices that people are experiencing, the FDA [17] nominated RF radiation to the NTP for chronic toxicology and carcinogenicity studies out of concern that "existing exposure guidelines are based on protection from acute injury from thermal effects of RFR exposure, and may not be protective against any non-thermal effects of chronic exposures." Adverse health effects noted in Assumption #1, including cardiomyopathy, carcinogenicity, sperm damage, and neurological effects, as well as the human epidemiology studies to be described in Assumption #6, occurred with much longer exposures to RF radiation than the exposure durations used in the acute studies in rats [10] and monkeys [11]. Consequently, the acute behavioral exposure studies that served as the basis for exposure limits to RF radiation established by the FCC and ICNIRP are inadequate to identify and characterize adverse effects of RF radiation after longer exposure durations. Neither the exposure limits established in the 1990s by the FCC [4] or by ICNIRP [9], nor those reaffirmed more recently by these groups [3, 5] address health risks associated with long-term exposure to RF radiation.

> **Assumption 4**) *No additional effects would occur from RF radiation with co-exposure to other environmental agents.*

The current FCC/ICNIRP exposure limits do not take into consideration interactive effects of RF radiation with other environmental agents even though such effects have been documented. Interactions of RF radiation with other agents may result in antagonistic or synergistic effects, i.e., effects that are greater than the sum of each agent alone.

In the International Agency for Research on Cancer (IARC) evaluation of the carcinogenicity of RF-EMF [44], the expert working group noted that 4 of 6 co-carcinogenesis studies available at that time showed increased responses with exposure to RF-EMF. One of those studies reported co-carcinogenic effects of UMTS-modulated RF radiation at 4.8 W/m^2 in the liver and lung of mice that had been treated with the carcinogen ethylnitrosourea (ENU) in utero [95]; the incidence of liver and lung cancers were increased in mice exposed to ENU plus RF radiation compared to cage controls, sham controls and ENU alone. After the IARC evaluation, Lerchl et al. [96] replicated the experimental design of Tillmann et al. [95] by exposing mice to RF-EMF at whole-body SAR levels of 0 (sham), 0.04, 0.4, and 2 W/kg. Significant increases in lung adenomas and/or liver carcinomas were observed at all exposure levels. Lerchl et al. [96] concluded that their "findings are a very clear indication that tumor-promoting effects

of life-long RF-EMF exposure may occur at levels supposedly too low to cause thermal effects." Thus, the reproducibility of the tumor-promoting effects of RFR at non-thermal exposure levels has been demonstrated.

Other examples of reported synergistic effects include the following study results. Synergistic effects on damage to human lymphocytes were observed with co-exposure to RFR (1.8 GHz RFR, SAR 3 W/kg) and 2 different mutagens, namely, mitomycin C or 4-nitroquinoline-1-oxide [97], or with co-exposure to ultralight (UVC) light [98]. A synergistic effect was found on DNA damage in human blood cells exposed to 2450 MHz radiation (5 mW/cm^2) and then exposed to mitomycin C [99]. A potentiation effect on DNA damage was observed in cultured mammalian cells exposed to CDMA-modulated 835 MHz RF-EMF (SAR = 4 W/kg) and the clastogens cyclophosphamide or 4-nitroquinoline-1-oxide [100]. Gene expression was altered in neuronal and glial cells of rats pre-treated with lipopolysaccharide, a neuroinflammatory agent, and then exposed to 1800 MHz GSM modulated radiation (SAR = 3.22 W/kg) for 2 hr. [101]. In rats pre-treated with picrotoxin, a chemical that induces seizures, exposure to pulse-modulated 900 MHz GSM-modulated RF radiation of mobile phones increased regional changes in brain activity and c-Fos expression [102, 103].

Exposure limits based on exposure to only RF radiation will result in an underestimation of the true risk and inadequate protection of human health under conditions in which co-exposures to other toxic agents lead to synergistic adverse effects [104].

B. Factors affecting dosimetry

Assumption 5) *Health effects are dependent only on the time-averaged SAR value; carrier wave modulations, frequency, or pulsing do not matter except as they influence the SAR.*

The FCC's and ICNIRP's exposure limits to RFR are based on SARs for frequencies up to 6 GHz and on power densities for frequencies between 6 GHz and 300 GHz averaged over 6-minute or 30-minute intervals for local areas and whole-body exposures [3, 5]. However, time-averaged dosimetry does not capture the unique characteristics of modulated or pulsed RFR. For example, GSM modulation may involve as many as 8 voice channels with a duration of 0.577 msec for each channel. Thus, the exposure from GSM modulation can be 8-times higher during each time slot pulse compared to exposure to a continuous wave at equivalent time-averaged SARs. Also, as noted under assumption #14, repetitive pulses of data in bursts with short exposures to 5G can cause localized temperature spikes in the skin [105]. The impact of pulsed radiation on biological activities at the molecular or cellular levels is not taken into consideration with time-averaged dosimetry.

Another issue not addressed by time-averaged dosimetry is the importance of low frequency modulations on biological systems. As discussed under assumption #2, increased production of ROS in living cells and DNA damage have been demonstrated with exposure to low frequency modulations of radiofrequency carrier waves [106]. Exposure limits based on time-averaged SAR dosimetry or power density, without consideration of the impact of amplitude or frequency modulations, do not adequately address potential health effects of real-world exposures to RFR. There is ample evidence that various effects of RFR exposure depend on carrier wave modulations, frequency, or pulsing [43, 107, 108]. In contrast to ICNIRP/FCC, the IARC monograph on RFR carcinogenicity noted that RFR effects may be influenced by such exposure characteristics as duration of exposure, carrier frequency, type of modulation, polarization, exposure intermittence, and background electromagnetic fields [44].

C. Human brain tumor risk

Assumption 6) *The multiple human studies that find associations between exposure to cell phone RF radiation and increases in brain tumor risk are flawed because of biases in the published case-control studies, and because brain cancer rates have remained steady since the time that use of wireless communication devices became widespread.*

Although claims have been made that "current limits for cell phones are acceptable for protecting the public health" because "even with frequent daily use by the vast majority of adults, we have not seen an increase in events like brain tumors" [109], the SEER (Surveillance, Epidemiology, and End Results Program) database shows an annual decrease of 0.3% for all brain tumors, but an increase of 0.3% per year for glioblastoma in the US between 2000 and 2018 (https://seer.cancer.gov/explorer/). Most concerning was that the annual increase for glioblastoma was 2.7% per year for people under 20 years of age. In addition, Zada et al. [110] reported that the incidence of glioblastoma multiforme (GBM) in the frontal lobe, temporal lobe, and cerebellum increased in the US between 1992 and 2006, and Philips et al. [111] likewise reported a statistically significant increasing incidence of GBM in the frontal and temporal lobes of the brain in the UK during 1995–2015. In Sweden, rates of brain tumors in the Swedish National Inpatient Register and the Swedish Cancer Register increased from 1998 to

2015 [112]. In addition, it should be realized that cumulative exposure, side-of-head use, and latency for tumor formation from RFR are not fully captured in national cancer registries. Thus, the claim that trends in brain cancer incidence rates have not increased since mobile phones were introduced is both wrong and misleading. The specificity of effect needs to be factored into such trend analyses.

Case-control studies, using sound scientific methods, have consistently found increased risks with long-term, heavy mobile phone use for brain tumors of the glioma type and acoustic neuroma. This association was evaluated at IARC in 2011 by 30 expert participants who concluded that radiofrequency (RF) radiation is a "possible" human carcinogen [44]. In contrast, the much-cited Danish cohort study on 'mobile phone users' [113] was disregarded by IARC due to serious methodological shortcomings in the study design, including exposure misclassifications [44, 114].

Results of meta-analyses of glioma risk and acoustic neuroma from Swedish case-control studies conducted by Hardell and coworkers [115, 116], the 13-nation Interphone study [117], and the French study by Coureau et al. [118] are shown in Table 1 as odds ratios (OR) with 95% confidence intervals. For glioma on any location in the head, a statistically significant increase of nearly two-fold was found, while for ipsilateral mobile phone use (tumor and phone use on the same side of the head) the risk was increased by 2.5-fold. These ORs are based on the groups in each study with the highest category of cumulative call time, which were ≥ 1640 hr. in the Interphone study [117, 119] and the Swedish studies [115, 116], and ≥ 896 hr. in the study by Coureau et al. [118]. Decreased survival among glioma cases, especially astrocytoma grade IV, was associated with long-term and high cumulative use of wireless phones [120]. Increased risk for the mutant type of *p53* gene expression in the peripheral zone of astrocytoma grade IV was associated with use of mobile phones for ≥3 hours a day. Increase in this mutation was significantly correlated with shorter overall survival time [121].

For acoustic neuroma, risk was significantly increased with cumulative exposure and ipsilateral use by 2.7-fold. A random effects model, which was based on a test for heterogeneity, was used for the meta-analyses of these published studies. Tumor volume of acoustic neuroma increased per 100 hr. of cumulative use of wireless phones in the Swedish study and years of latency, indicating tumor promotion [115].

Other case-control studies of mobile phone use also reported increased risk of acoustic neuroma [122–124]. Those studies were not included in the meta-analysis because data on cumulative mobile phone use with numbers of cases and controls were not given or there were other shortcomings. It is also noteworthy that tumor risks were increased in subsets of the Interphone study; for example, there was nearly a 2-fold increase in the risk of acoustic neuroma for ≥10 y and ipsilateral use among the North European countries that participated in the Interphone study [125].

Claims have been made that associations between increases in brain cancer risk and exposure to cell phone RF radiation in the published case-control studies may be attributable to recall and/or selection biases [5, 109]. However, a re-analysis of the Canadian data that was included in the Interphone study showed that there was no effect on the risk of glioma after adjustments were made for selection and recall biases [126]. Odds ratios (OR) for glioma were increased significantly and to a similar extent when comparing the highest quartile of use to those who were not regular users whether or not adjustments for biases were made. In addition, Hardell

Table 1 Odds ratios (OR) with 95% confidence interval (CI) for glioma and acoustic neuroma in case-control studies in the highest category for cumulative mobile phone use in hours[a]

	Glioma				Acoustic neuroma			
	All		Ipsilateral		All		Ipsilateral	
	OR	95% CI	OR	95% CI	OR	95% CI	OR	95% CI
Interphone [117, 119] Cumulative use ≥1640 hr	1.40	1.03–1.89	1.96	1.22–3.16	1.32	0.88–1.97	2.33	1.23–4.40
Coureau et al. [118] Cum use ≥896 hr	2.89	1.41–5.93	2.11	0.73–6.08				
Hardell et al. [115, 116] Cumulative use ≥1640 hr	2.13	1.61–2.82	3.11	2.18–4.44	2.40	1.39–4.16	3.18	1.65–6.12
Meta-analysis longest cumulative use	**1.90**	**1.31–2.76**	**2.54**	**1.83–3.52**	**1.73**	**0.96–3.09**	**2.71**	**1.72–4.28**

[a] Note Hardell et al. [115, 116] also assessed use of cordless phones

and Carlberg [116] showed that the risk for glioma with mobile phone use was increased significantly even when compared to the risk for meningioma. Because risk of meningioma was not increased significantly, this tumor response could not be attributed to recall bias. Clearly, selection and recall biases do not explain the elevated brain tumor risk associated with the use of mobile phones. Thus, epidemiological evidence contradicts the opinions of the FCC and ICNIRP on brain tumor risk from RF radiation.

It should also be noted that the thyroid gland is a target organ for RFR from smartphones. A case-control study on mobile phone use suggested an increased risk for thyroid microcarcinoma associated with long-term cell phone use [127]. Peripheral lymphocyte DNA obtained from cases and controls was used to study genotype-environment interactions. The study showed that several genetic variants based on single nucleotide polymorphisms (SNPs) increased the risk of thyroid cancer with mobile phone use [128]. Increasing incidence of thyroid cancer in the Nordic countries, especially over the last two decades, has also been reported [129, 130]. In addition, a recent case-control study found significant increases in breast cancer risk among Taiwanese women based on their use of smartphones and distance between the breast and placement of their smartphone [131].

D. Individual variations in exposure and sensitivity to RF-EMF

Assumption 7) *There are no differences among individuals, including children, in the absorption of RF-EMF and susceptibility to this radiation.*

Differences between children and adults regarding the absorption of radiofrequency electromagnetic fields when mobile phones are operated close to the head have been demonstrated and widely documented [132–137]. The main factors accounting for these dissimilar absorption rates include differences in anatomy, tissue dielectric properties, and physiology. Through finite-difference time-domain (FDTD) simulations, employing detailed computational anthropomorphic models, it is possible to find differences relating to anatomy and to dimensions of the head.

Since EMF penetration into human tissues can be in the order of a few centimeters, depending on the wavelength, the inner tissues in the brain clearly will receive a significantly higher dose in the smaller heads of children compared to adults, despite the total absorption and the peak spatial SAR (psSAR) calculated across the whole head varying by smaller amounts [132, 133, 138]. Fernández et al. [136] estimated that the cell phone radiation psSAR in the hippocampus was 30-fold higher in children compared to adults, while the psSAR in the eyes was 5-fold higher in children; these differences were due largely to closer proximity to the cell phone antennas. The thinner dimensions of children's skulls also contribute to this difference [135], resulting in a psSAR around 2-fold higher in children's brains [134–137, 139] compared to adults.

Additionally, tissues of young mammals have higher conductivity and electrical permittivity than those of mature animals [140]. This also contributes to greater EMF penetration and absorption, resulting in further increases in the psSAR. The psSAR in the skull bone marrow of children was estimated to increase by 10-fold due to higher conductivity in this tissue [137]. Distance between the mobile device and the body tissues is important in characterizing tissue dosimetry. The National Agency ANFR of France recently released cell phone SAR test data for 450 cell phones. Ten gram psSARs increased by 10–30% for each millimeter of proximal placement of the cell phone to the planar body phantom (http://data.anfr.fr/explore/dataset/das-telephonie-mobile/?disjunctive.marque&disjunctive.modele&sort=marque).

Finally, it is important to note that simulations of tissue dosimetry consider only the physical parameters of the tissues; they do not consider biological processes occurring in living tissues. While children are growing, developing organs and multi-organ systems are more susceptible to adverse effects of environmental agents; finite-difference time-domain (FDTD) simulations do not address differences in organ or system susceptibility for exposures occurring during child development.

Assumption 8) *There are no differences among individuals in their sensitivity to RF radiation-induced health effects.*

All life is "electrosensitive" to some degree as physiological processes are dependent on both subtle and substantial electromagnetic interactions at every level, from the molecular to the systemic. Responses to multiple types of electromagnetic exposure reveal that there is a far broader range of EMF sensitivity than previously assumed, and subgroups of extremely hypersensitive subjects exist [141–151]. Given the adverse health effects noted in Assumption #1, including cardiomyopathy, carcinogenicity and neurological effects, the acute, conscious symptoms manifesting in some individuals should not be unexpected. The term currently and most frequently used within the medical profession to describe those who are acutely, symptomatically sensitive to non-ionizing radiation exposures is Electromagnetic Hypersensitivity (EHS).

EHS is a multisystem, physical response characterized by awareness and/or symptoms triggered by EMF exposures. Common symptoms include (but are not limited to) headaches, dizziness, sleep disturbance, heart palpitations, tinnitus, skin rashes, visual disturbance, sensory disturbance, and mood disturbance [152, 153]. These symptoms are reported in response to even extremely low intensity (orders of magnitude below current safety levels) EMFs of multiple types (in terms of frequency, intensity and waveforms). Commonly noticed triggers of frequent and persistent EHS symptoms are pulse-modulated RF emissions, modulated at extremely low frequencies. Common triggering sources include mobile phones, DECT cordless landlines, Wi-Fi/Bluetooth-enabled computers, Wi-Fi routers, smart meters, base station antennas, and household electrical items. EMF avoidance/mitigation is found to be the most effective way to reduce symptoms [154].

Guidelines for EHS diagnosis and management have also been peer-reviewed and concur that the mainstay of medical management is avoidance of anthropogenic electromagnetic fields [152, 155, 156]. Case histories detailing clinical presentations, EMF measurements and mitigation are also published [157], and biomarkers including elevated markers of oxidative stress, inflammatory markers and changes in cerebral blood flow continue to be explored [152].

EHS has been proven to be a physical response under blinded conditions [145, 151, 158, 159] and, in addition to these studies, acute EMF-induced changes in cognition, behavior, and physiology reactions have been observed in studies involving animals [27, 30, 160–172]; plus further references under Assumption 13), which cannot be biased by media-cultivated fears. These studies provide further evidence which invalidates the nocebo response (physical symptoms induced by fear) as causal regarding symptoms.

It should not be expected that all provocation studies will reliably demonstrate adverse reactions; however, suggestions that the nocebo response may cause EHS symptoms were claimed from provocation studies which failed to show a relationship between the EMF exposure and the reported symptoms [173]. The failures of these studies are explainable given the very poor methodology in the majority of them. There were failures to account for a multitude of essential factors that must be tailored to the individual, such as variable symptom onset and offset, the necessity for adequate washout periods, specificity of trigger frequencies and intensities, requirement for complete EMF hygiene during sham exposures, requirement for life-like exposures (e.g., pulse-modulated information-carrying waves), etc. For example, it has been shown that various frequency channels from GSM/UMTS mobile phones affect the same human cells differently [174–177]. Similarly, EHS has been shown to be frequency dependent [151]. As noted above, meaningful provocation studies need to take into consideration multiple physical parameters of exposure, including frequency, modulation, duration of exposure, and time after exposure [155]; however, most provocation studies that have failed to establish causative connection between RFR exposure and EHS symptoms [173] used only one or two conditions with short-term exposures.

There are many issues with the nocebo response as a cause of EHS, not least of which is also the absence of the required temporal link. For the nocebo response to be the cause of EHS, awareness and concern of negative health impacts from EMFs must precede symptoms. But, in the majority of EHS persons this is not the case [178]. As public risk communication improves, this will no longer be verifiable; however, this has been importantly observed at the only point in time when it could have been – prior to generalized awareness of health detriments from non-ionizing radiation (NIR).

While recognizing that some vulnerable groups may be more susceptible to effects of NIR exposure, ICNIRP [179] acknowledged that their guidelines may not safely accommodate these sensitive subgroups:

> *"Different groups in a population may have differences in their ability to tolerate a particular NIR [Non-Ionizing Radiation] exposure. For example, children, the elderly, and some chronically ill people might have a lower tolerance for one or more forms of NIR exposure than the rest of the population. Under such circumstances, it may be useful or necessary to develop separate guideline levels for different groups within the general population, but it may be more effective to adjust the guidelines for the general population to include such groups. Some guidelines may still not provide adequate protection for certain sensitive individuals nor for normal individuals exposed concomitantly to other agents, which may exacerbate the effect of the NIR exposure, an example being individuals with photosensitivity".*

In 2020, ICNIRP [23] also noted that biological effects are not easily discernible from adverse health effects, and that their guidelines:

> *"…are not intended to protect against biological effects as such (when compensatory mechanisms are overwhelmed or exhausted), unless there is also an associated adverse health effect. However, it is not always easy to draw a clear distinction between biological and adverse health effects, and indeed this can vary depending on individual susceptibility*

to specific situations. An example is sensory effects from nonionizing radiation exposures under certain circumstances, such as a tingling sensation resulting from peripheral nerve stimulation by electric or magnetic fields; magnetophosphenes (light flickering sensations in the periphery of the visual field) resulting from stimulation of the retina by electric fields induced by exposure to low-frequency magnetic fields; and microwave hearing resulting from thermoelastic waves due to expansion of soft tissues in the head which travel via bone conduction to the inner ear. Such perceptions may sometimes lead to discomfort and annoyance. ICNIRP does not consider discomfort and annoyance to be adverse health effects by themselves, but, in some cases, annoyance may lead to adverse health effects by compromising well-being. The exposure circumstances under which discomfort and annoyance occur vary between individuals".

Trivializing "discomfort" which is the pre-cursor to pain is not in keeping with WHO recommendations quoted by the same ICNIRP [23] document: "Health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity."

Discomfort is a sign that an organism is experiencing something which is compromising optimal health and although in some cases this can be trivial and reversible, in other cases it may not be reversed. There is an extremely broad range of both pain tolerance and also of pain perception among humans, and to achieve meaningful preventative health care, "discomfort" must be taken seriously and mitigated whenever possible. This is especially true in this case where symptoms such as headaches are being reported in response to mobile phone exposures at the same time as increased brain tumor risk is noted from those same exposures (see Assumption 6).

In reality, people with EHS are reporting far more serious health disruption than "discomfort" or "annoyance" and in some cases these symptoms are disabling [180, 181]. Increasingly, EHS is being recognized as a disability by national courts in France, Sweden, and Spain, which amplifies the requirement for safety guidelines that are deliberately accommodating to this more susceptible group [180].

E. Applied safety factors for RF-EMF-RF workers and the general population

Assumption 9) *A 50-fold safety factor for whole body exposure to RF radiation is adequate for protecting the general population to any health risks from RF radiation.*

Public health agencies in the US and worldwide apply multiple uncertainty factors to health effects data to establish exposure levels that are considered safe for the great majority of exposed populations [182–184]. Although guidelines for the use of uncertainty factors were developed for chemicals, they are also pertinent to other toxic agents, such as RFR. The uncertainty factors needed for toxic effects of RFR based on studies that demonstrate a no-observed-adverse-effect level (NOAEL) in experimental animals include:

1) Animal-to-human extrapolation. When data are based on studies in experimental animals, a factor of 3–10 is applied (for potential species differences in tissue dosimetry and response) unless there are convincing data demonstrating equivalent sensitivity in animals and humans. However, there is no evidence showing that humans are equally or less sensitive to RFR than animals that were used in studies from which exposure limits were established by the FCC and ICNIRP.
2) Adjustment for human variability. A second factor of 10 is used to account for interindividual variability in susceptibility (for instance, due to differences in age, sex, genetic variation, pre-existing diseases) to the toxic agent among the general population. It has been recognized that a factor of 10 for human variability is likely inadequate for sensitive subpopulations and may require an additional adjustment.
3) Extrapolation from short-term studies to lifetime exposure. An additional factor of 10 is applied for short-term studies, such as those used to establish exposure limits to RF radiation, to provide lifetime protection from chronic exposure. This is of particular importance considering the remarkably short periods over which RFR toxicity was originally assessed [10, 11].
4) Database insufficiencies. Finally, an uncertainty factor of 3-to-10 is applied for database inadequacy, i.e., for incomplete characterization of an agent's toxicity. The behavioral studies [10, 11] that were used to establish the FCC and ICNIRP exposure limits to RFR do not provide a full characterization of the effects of this type of radiation nor did they identify the most sensitive adverse effect of RFR exposures.

Basing exposure limits to RFR on the behavioral studies in rats and monkeys [10, 11, 90, 91] would require the application of a composite uncertainty factor of about 900 to 10,000 to be consistent with approaches used by public health agencies to establish protective exposure limits for workers and the general population. Based on the size of the needed uncertainty/safety factor, the

data sets used by the FCC and ICNIRP are clearly inadequate to establish RF exposure limits with reasonable confidence. The arbitrarily selected safety factors of 10 for workers and 50 for the general population by the FCC and ICNIRP are woefully inadequate for protecting exposed populations.

When uncertainty/safety factors are applied to a misrepresented threshold exposure value for adverse effects, the resulting level does not provide assurance of health protection for the general population exposed to that agent. Studies cited above [18, 22, 91, 92, 96] show that the whole-body SAR of 4 W/kg is not a threshold level for adverse effects caused by RFR. In a recent quantitative analysis of various adverse health effects from the NTP study, Uche and Naidenko [185] showed that the permissible whole-body SAR of 0.08 W/kg (based on a 50-fold reduction of the assumed threshold SAR of 4 W/kg) was 20–40-fold higher than health protective SAR values derived by benchmark dose modelling of NTP data for cardiomyopathy (following application of 10-fold safety factors for interspecies and intraspecies variability). The approaches used by these authors are consistent with methodologies recommended by the US Environmental Protection Agency for quantifying health risks for toxic and carcinogenic environmental agents [1, 182]. Thus, a 50-fold reduction of the assumed threshold whole-body SAR of 4 W/kg is inadequate to protect the health of the general population from exposure to RF radiation.

> **Assumption 10)** *A 10-fold safety factor for whole body exposure to RF radiation is adequate for protecting workers to any health risks from RF radiation.*

When RFR exposure limits were implemented in 1997, the rationale given for the difference in safety factors for the general population (50-fold) and for workers (10-fold) was "based on the exposure periods of the two populations, rounded to one digit (40 work hours per week/168 hours per week = ~0.2)" [6]. In addition to differences in exposure periods between workers and the general population, ICNIRP rationalizes the appropriateness of the lower safety factor for workers because "occupationally-exposed individuals can be considered a more homogeneous group than the general population," they are, "in general, relatively healthy adults within a limited age range," and "occupationally-exposed individuals should be operating under controlled conditions and be informed about the risks associated with non-ionizing radiation exposure for their specific situation and how to reduce these risks" [23]. In contrast, "the general public are, in most cases, unaware of their exposure to non-ionizing radiation and, without education, cannot reasonably be expected to take precautions to minimize or avoid any adverse effects of exposure."

The assumption that workers are trained in understanding health risks associated with exposure to RFR and in mitigating those risks to the greatest possible degree is not correct because neither the FCC nor the ICNIRP guidelines recognize any health effects from RFR at SARs below 4 W/kg, and the exposure limits authorized by the FCC and ICNIRP do not consider health effects from long-term exposures [3, 5]. The only health effect addressed by the FCC and ICNIRP is tissue damage due to excessive heating from acute exposures. Thus, the 10-fold reduction from the threshold whole-body SAR calculated from acute behavioral studies in rats and monkeys is inadequate for protecting the health of workers exposed long-term to RFR (see comments under assumption #9). There are no data demonstrating the adequacy of this arbitrarily chosen safety/uncertainty factor for occupationally-exposed workers, while on the contrary, excess cancer risks have been associated with exposure to RFR workers who operate radar and communication systems in military and occupational settings [186].

> **Assumption 11)** *Exposure of any gram of cube-shaped tissue up to 1.6 W/kg, or 10 g of cube-shaped tissue up to 2 W/kg, (duration not specified) will not increase the risk of that tissue to any toxic or carcinogenic effects in the general population.*

Tissue dosimetry was analysed in the NTP study of cell phone RF radiation in rats and mice [187]. In rats, whole body exposures during the 10-minute on cycles were 1.5, 3.0, or 6.0 W/kg, and the brain and heart SARs varied from the whole-body SARs by about 7% to under 2-fold for the brain and heart, respectively. A quantitative risk assessment of the NTP tumor incidence data is needed to evaluate organ-specific cancer risk. The FDA [19] nomination to the NTP recognized the need for "large well-planned animal experiments …. to provide the basis to assess the risk to human health of wireless communications devices." However, more than 3 years after an external peer-review of the NTP studies found "clear evidence of carcinogenic activity," the FDA [109] has continued to downplay the importance of these findings and avoid conducting a quantitative risk assessment of the tumor data that they (the FDA) originally requested. In contrast to the FDA, Uche and Naidenko [185] analysed the NTP data on cardiomyopathy by a benchmark dose approach and found that the 10% extra risk level for this effect was in the range of a whole-body SAR of 0.2 to 0.4 W/kg. Thus, there is an increased risk (greater than 10%) of developing cardiomyopathy at local tissue SARs below 1.6 or 2.0 W/kg.

The peak spatial specific absorption rate (psSAR), as used by ICNIRP and the FCC, is an inadequate dosimetric of RF radiation at frequencies above 1 GHz. The psSAR is calculated by averaging fixed cubic volumes containing a given amount of mass, and assumes a homogeneous material with a given mass density. The ICNIRP recommendation is to average cubic volumes containing 10 g of tissue (10 g-psSAR), while the FCC recommendation is to average cubic volumes containing 1 g of tissue (1 g-psSAR). Current recommendations limit the use of psSAR to frequencies up to 6 GHz [3, 5].

An evaluation of the utility of using psSAR as a dosimetric parameter at different frequencies ranging from 100 MHz to 26 GHz and with cube sizes ranging from 10 mg to 10 g is shown in Additional file 2: Appendix 2. For the smaller cubes and lower frequencies, averaging in the cube does not underestimate the maximum value on the cube surface, but at higher frequencies the psSAR averaged on larger cubes can be several-fold lower than the psSAR averaged on smaller cubes. For example, at 2.45 GHz, averaging over a 10-g cube underestimates by 4 dB (approximately 2.5-fold) the psSAR averaged in smaller cubes, while for 5.8 GHz, averaging over a 10-g cube underestimates the psSAR by 12 dB (approximately 16-fold) compared with averaging in a 10-mg cube, and by 6 dB (approximately 4-fold) compared with averaging over a 1-g cube. When the frequency is increased, the underestimation of the psSAR averaged in larger cubes (e.g. 10 g or 1 g) compared to smaller cubes (e.g. 100 mg and 10 mg) becomes more pronounced. Considering the 10-g cube, the difference between the psSAR for 5.8 GHz EMF compared to 0.9 GHz EMF is around 7 dB (or approximately 5-fold underestimation). These large differences are due to reduced penetration of EMFs at higher frequencies. Therefore, the ICNIRP's 10 g-psSAR and FCC's 1 g-psSAR recommendations do not provide reliable dosimetric parameters to evaluate EMF absorption above 1 GHz.

The SAR averaging over a 10-g cube is also flawed for assessing carcinogenicity because it is too large a volume to focus on stem cells and their important role in carcinogenesis. Human stem cells were more sensitive to RFR exposures from GSM and UMTS mobile phones than lymphocytes and fibroblasts [175]. Instead of a random distribution of targets for carcinogenesis, localized distribution of SAR in smaller volumes is needed to more accurately characterize relationships between SAR and tumor induction. From the point of view of stem cell organization, the volume of SAR determinations may be especially important for setting safety limits for children, because most stem cells and their niches are spatially and temporally transient during brain development [188].

Assumption 12) *Exposure of any gram of cube-shaped tissue up to 8 W/kg, or 10 g of cube-shaped tissue up to 10 W/kg, (duration not specified) will not increase the risk of that tissue to any toxic or carcinogenic effects in workers.*

Based on the analyses of tissue dosimetry in the NTP study [187], organ-specific toxic and carcinogenic effects were observed in rats at local tissue SARs that were much lower than 8 or 10 W/kg [18]. The tissue dosimetry in the NTP study and the inadequacy of the local SAR as specified by ICNIRP and the FCC is described in assumption #9.

F. Environmental exposure to RF radiation

Assumption 13) *There is no concern for environmental effects of RF radiation or for effects on wildlife or household pets.*

While background levels of RF-EMF are increasing in the environment, including rural remote areas [189], neither the FCC nor the ICNIRP take into consideration effects of this radiation on wildlife. The constant movement of most wildlife species in and out of varying artificial EMF can result in high exposures near communication structures, especially for flying species such as birds and insects. There is a substantial amount of scientific literature on the disrupting effects of RFR on wildlife (e.g., [190–206]).

Many nonhuman species use Earth's geomagnetic fields for activities such as orientation and seasonal migration, food finding, mating, nest and den building [190]. For example, migratory bird species [191, 192], honeybees [193], bats [194], fish [195–197], and numerous other species sense Earth's magnetic fields with specialized sensory receptors. Mechanisms likely involved in magneto-reception include magnetic induction of weak electric signals in specialized sensory receptors [198], magneto-mechanical interactions with the iron-based crystal magnetite [194], and/or free-radical interactions with cryptochrome photoreceptors [191, 192]. Each of these sensing processes shows extreme sensitivity to low intensity changes in electromagnetic fields. For a fuller description of the mechanisms by which non-human species use magneto-reception to perform essential life activities see Levitt et al. [190].

The following studies represent a few of the many examples of the disrupting effects of low-level exposures to RF-EMF on magneto-reception and the natural behavior of wildlife. Oscillating magnetic fields have been reported to disrupt the ability of migratory birds to orient and navigate in Earth's geomagnetic field [199–202].

Garden warblers became disoriented by exposure to a weak oscillating magnetic field of 1.403 MHz at an intensity as low as 2–3 nT [200]. The orientation of European robins that use Earth's magnetic field for compass orientation was completely disrupted by exposure to electromagnetic noise in the frequency range of 50 kHz to 5 MHz or a broadband noise-modulated ELF covering the range ~ 2 kHz to ~ 9 MHz [199, 201]. RFR in the low MHz range (7.0 MHz of 480 nT or 1.315 MHz of 15 nT) has been shown to disable the magneto-reception avian compass as long as the exposure was present [202].

In addition to effects on migratory birds, Landler et al. [203] found that exposure to a low-level magnetic field (1.43 MHz at an intensity of 30–52 nT) disrupted the natural orientation of juvenile turtles hatched on land. GSM-modulated 900 MHz RF radiation caused ants to lose their visual and olfactory memory for finding food [166]. Navigational abilities of trout were reduced when reared under conditions in which magnetic fields were spatially distorted [204].

Activities of honeybees are also disrupted by exposure to RF radiation. GSM-modulated cell phone radiation (900 MHz) caused a reduction in egg laying by queen bees and depletion of beehive pollen and honey counts [205]. GSM-modulated cell phone radiation (900 MHz) reduced hatching and altered pupal development of honey queen bee larvae [206].

The lack of consideration of chronic low-level RF radiation exposure on wildlife could result in dangerously disruptive effects on fragile ecosystems and on the behavior and survival of species that have long existed in Earth's natural environment.

G. 5G (5th generation wireless)

Assumption 14) *No health effects data are needed for exposures to 5G; safety is assumed because penetration is limited to the skin ("minimal body penetration").*

Fifth generation (5G) wireless communication systems are being deployed worldwide to provide higher data transfer rates with shorter lag times between massive numbers of connected wireless devices. To provide faster transfer of large amounts of data (up to 20 gigabits per second peak data rates), the frequency range for 5G includes millimeter waves (30 to 300 GHz), in addition to carrier frequencies as low as 600 MHz. Extremely high frequency millimeter waves (MMW) that transmit large amounts of data to user devices are directed into narrow beams by line-of-sight transmission with beamforming antennas. Because millimeter waves do not penetrate solid structures such as building materials, hills, foliage, etc., and travel only short distances (a few hundred meters), denser networks of base-stations with massive Multiple Input/Multiple Output (MIMO) transmitters and receivers in millions of small cell towers are being installed on structures such as utility poles. These features can lead to much closer proximity between humans and radiation-emitting antennas, and thereby change individual peak and average exposures to RFR.

For a 5G frequency of 26 GHz, EMF absorption is very superficial, which means that for typical human skin, more than 86% of the incident power is absorbed within the first millimeter. The skin penetration depth was computed as 1 mm based on the electrical conductivity of the skin and its electrical permittivity [5, 207]. This is expected to bring the SAR in this tissue well above the recommended limits ([208], and Additional file 2: Appendix 2). This is also expected to be harmful to very small species, such as birds and other small animals (e.g., insects) [209]. It is often claimed that because of its shallow penetration, exposure to high frequency 5G radiation is safe, and that the only effect is tissue heating [210]. However, this view ignores the deeper penetration of the ELF components of modulated RF signals, which are rated on the basis of heat alone, as well as the effects of short bursts of heat from pulsed signals [211, 212]. Within the first 1 mm of skin, cells divide to renew the stratum corneum (a consideration for skin cancer), and nerve endings in the dermis are situated within 0.6 mm (eyelids) to 3 mm (feet) of the surface (a consideration for neurological effects). Ultraviolet light, which exerts its action at a penetration depth of less than 0.1 mm [213, 214] is a recognized cause of skin cancer [87].

The higher the frequency of electromagnetic waves, the shorter the wavelength and the shallower the penetration of energy into exposed people or animals. For example, penetration depth in the human body is about 8 mm at 6 GHz and 0.92 mm at 30 GHz [5]. Because of the minimal depth of energy absorption at frequencies above 6 GHz, the FCC and ICNIRP have based exposure limits on power density instead of on SAR levels. The FCC [3] proposed a general localized power density exposure limit of 4 mW/cm^2 averaged over 1 cm^2 and not to exceed 30 minutes for 5G services up to 3000 GHz for the general population, claiming that this exposure is consistent with the peak spatial-average SAR of 1.6 W/kg averaged over any 1 g of tissue at 6 GHz. ICNIRP's [5] exposure limits for 5G are an absorbed power density of 200 W/m^2 (0.2 W/cm^2) averaged over 4 cm^2 and a 6-minute interval for frequencies up to 30 GHz, and 400 W/m^2 (0.4 mW/cm^2) averaged over 1 cm^2 and a 6-minute interval for frequencies of 30 GHz to 300 GHz.

Because of its minimal penetration, exposure to 5G radiation results in higher energy intensity on the skin and other directly-exposed body parts, such as the eye

cornea or lens. However, the skin, which is the largest organ in the human body, provides important functions such as acting as a protective physical and immunological barrier against mechanical injury, infection by pathogenic microorganisms, and entry of toxic substances. In addition, skin cancers, including basal cell carcinomas and squamous cell carcinomas, are the most prevalent human cancers, while melanomas are highly metastatic and increasing in prevalence. Although the high incidence of skin cancers are largely attributed to exposure to ultraviolet light, no studies have been reported on the effects of 5G radiation on (i) the skin's ability to provide protection from pathogenic microorganisms, (ii) the possible exacerbation of other skin diseases, (iii) promotion of sunlight-induced skin cancers, or (iv) initiation of skin cancer by itself. Information is also lacking on the effects of 5G radiation on nervous and immune systems which are also exposed even by the shallower penetration of MMW.

Another important factor is the maximum bandwidth with 5G radiation, which is up to 100 MHz in the frequency range of 450 MHz to 6 GHz, and up to 400 MHz in the ranges from 24 GHz to 52 GHz, compared to previous types of mobile communication where bandwidth is limited to 20 MHz. Because many studies indicated frequency-dependent, non-thermal RF effects from mobile communication RFR [43, 177] and for MMW effects [215, 216], the possibility of effective frequency windows for biological effects would increase with the increased bandwidth of 5G radiation.

Another consideration for effects of 5G exposures on human health is that radiation pulses created by extremely fast data transmission rates have the potential to generate bursts of energy that can travel much deeper than predicted by conventional models [217, 218]. Neufeld and Kuster [105] showed that repetitive pulses of data in bursts with short exposures to 5G can cause localized temperature spikes in the skin leading to permanent tissue damage even when the average power density values were within ICNIRP's acceptable safety limits. The authors urged the setting of new thermal safety standards to address the kind of health risks possible with 5G technology:

> *"The FIFTH generation of wireless communication technology (5G) promises to facilitate transmission at data rates up to a factor of 100 times higher than 4G. For that purpose, higher frequencies (including millimetre-wave bands), broadband modulation schemes, and thus faster signals with steeper rise and fall times will be employed, potentially in combination with pulsed operation for time domain multiple access…The thresholds for frequencies above 10 MHz set in current exposure guidelines (ICNIRP 1998, IEEE 2005, 2010) are intended to limit tissue heating. However, short pulses can lead to important temperature oscillations, which may be further exacerbated at high frequencies (>10 GHz, fundamental to 5G), where the shallow penetration depth leads to intense surface heating and a steep, rapid rise in temperature…"*

Areas of uncertainty and health concerns with 5G radiation include potential increase in skin cancer rates with (or possibly without) co-exposure to sunlight, exacerbation of skin diseases, greater susceptibility to pathogenic microorganisms, corneal damage or early development of cataracts, testicular effects, and possible resonant-enhanced absorption due to skin structures [219]. One of the complex technical challenges in relation to human exposure to 5G millimeter waves is that the unpredictable propagation patterns that could result in unacceptable levels of human exposure to electromagnetic radiation are not well understood [220]. Although MMW are almost completely absorbed within 1–2 mm in biologically-equivalent tissues, their effects may penetrate deeper in a live human body possibly by affecting signal transduction pathways. Thus, there are too many uncertainties with exposure to 5G to support an assumption of safety without adequate health effects data. There are no adequate studies on health effects from short-term or long-term exposures to 5G radiation in animal models or in humans.

Discussion

To develop health-based exposure limits for toxic and carcinogenic substances, regulatory agencies typically rely on available scientific evidence about the agent under review. In the mid- and late-1990s when the FCC [4] and the ICNIRP [9] initially established exposure limits for RFR, the prevailing assumptions were that any adverse effects from exposure to RFR were due to excessive heating because non-ionizing radiation did not have sufficient energy to break chemical bonds or damage DNA. However, non-thermal effects of RFR are demonstrated from studies that find different effects with exposure to continuous waves versus pulsed or modulated waves at the same frequency and the same SAR or power density, e.g., [221–226], and from studies that show adverse effects at very low exposure intensities, e.g., [78, 96].

Acute exposure studies conducted in rats and monkeys in the 1980s [10, 11] suggested that an SAR of 4 W/kg could be a threshold dose for behavioral effects. Because this SAR was associated with an approximate increase in body temperature of 1 °C, it was again assumed that no adverse health effects would occur if increases in core

body temperature were less than 1 °C. From this putative threshold dose a "safety factor" of 10 was applied for occupational exposures and an additional factor of 5 (50x total) was applied for the general population, resulting in exposure limits in which the whole-body SAR was less than 0.4 W/kg for workers and 0.08 W/kg for the general population. However, realizing that local parts of the body could receive doses of RFR that were 10 to 20 times higher than the whole-body SARs, local peak exposure limits were set by the FCC at SARs 20-times higher than the whole-body SARs, i.e., 8 W/kg averaged over any 1-g of tissue for localized exposures for workers and 1.6 W/kg averaged over any 1-g for the general population [3, 4]. ICNIRP opted for partial body exposures that would not exceed 2.0 W/kg averaged over any 10 g of cube-shaped tissue for the general population [5, 9]. To rationalize the smaller safety factor for workers (10-fold) versus the general population (50-fold), one claim made by ICNIRP [24] is that workers are informed about risks associated with non-ionizing radiation exposure and how to reduce these risks, whereas "the general public are, in most cases, unaware of their exposure to non-ionizing radiation and, without education, cannot reasonably be expected to take precautions to minimize or avoid any adverse effects of exposure." From a public health perspective, the FCC and ICNIRP should make the public aware of their exposures to RFR and promote precautionary measures to minimize potential adverse effects, especially for children and pregnant women. Eight practical recommendations by the International EMF Scientist Appeal aimed at protecting and educating the public about potential adverse health effects from exposures to non-ionizing EMFs [227] are shown in Table 2.

The acute behavioral studies that provide the basis for the FCC's and ICNIRP's exposure limits lacked any information on potential effects of RF radiation that can occur after longer durations of exposure, and they did not address effects of carrier wave modulations used in wireless communications. Research on RFR conducted over the past 25 years has produced thousands of scientific papers, with many demonstrating that acute behavioral studies are inadequate for developing health protective exposure limits for humans and wildlife, and that inherent assumptions underlying the FCC's and ICNIRP's exposure limits are not valid. First, 4 W/kg is not a threshold SAR for health effects caused by RFR exposures; experimental studies at lower doses and for longer durations of exposure demonstrated cardiomyopathy, carcinogenicity, DNA damage, neurological effects, increased permeability of the blood brain barrier, and sperm damage (see Assumptions 1–3). Multiple robust epidemiologic studies on cell phone radiation have found increased risks for brain tumors (Assumption 6), and these are supported by clear evidence of carcinogenicity of the same cell types (glial cell and Schwann cell) from animal studies. Even studies conducted by D'Andrea et al. [89, 90] before the limits were adopted found behavioral disruption in rats exposed to RFR for 14 or 16 weeks at mean SARs of 0.7 W/kg and at 1.23 W/kg. A combination of exposure duration and exposure intensity would be more appropriate for setting safety standards for exposure to RFR from mobile communication systems including mobile phones, base stations, and WiFi.

More than 120 studies have demonstrated oxidative effects associated with exposure to low intensity RFR (Additional file 1: Appendix 1). DNA damage that has been reported in studies of RFR was most likely caused by induction of oxidative stress, which is a key characteristic of human carcinogens [88], rather than by direct ionization (Assumption 2). The generation of reactive oxygen species has also been linked to DNA damage and the carcinogenicity of UVA radiation [87] and asbestos [228]. Despite the enormous amount of scientific evidence of low-dose effects of RFR, the IEEE [229] maintains that behavioral disruption is still the most sensitive and reproducible effect of RFR. It is this opinion that contributed to the FCC [3] and ICNIRP [5] reaffirming their previous exposure limits to RFR.

Table 2 Precautionary Measures Recommended by the International EMF Scientist Appeal

1) Priority should be given to protect children and pregnant women
2) Guidelines and regulatory standards should be strengthened
3) Manufacturers should be encouraged to develop safer technologies
4) The public should be fully informed about the potential health risks from electromagnetic energy and taught harm reduction strategies
5) Medical professionals need to be educated about the biological effects of electromagnetic energy and be provided training on treatment of patients with electromagnetic sensitivity
6) Governments need to fund training and research on electromagnetic fields and health that is independent of industry
7) The media should disclose experts' financial relationships with industry when citing their opinions regarding health and safety aspects of EMF-emitting technologies
8) Radiation-free areas need to be established, especially for individuals with EHS

Other concerns about the current exposure limits for RFR are that they do not consider potential synergistic effects due to co-exposure to other toxic or carcinogenic agents, the impact of pulsed radiation or frequency modulations, multiple frequencies, differences in levels of absorption or of susceptibility by children, or differences among individuals in their sensitivity to RFR (see Assumptions 4, 5, 7, 8). Currently, children's cumulative exposures are much higher than previous generations and they continue to increase [230]. ICNIRP [23, 179] acknowledged that their guidelines do not accommodate sensitive subgroups and admit to difficulties separating "biological effects" from "health effects." Neurological symptoms, some of which are acknowledged by ICNIRP and currently being experienced by persons with EHS, are most certainly non-thermal "health effects" that need to be mitigated by providing environments with reduced exposures to anthropogenic EMF for hypersensitive individuals.

The debilitating effects and restrictions suffered by adults and children with EHS constitutes a contravention of the 2010 Equalities Act, Human Rights Act and other ethical and legal frameworks. Failure to respond and appropriately safeguard this group is already causing preventable morbidity, mortality and economic deficit due to lost workdays, compensations for health damages and increased healthcare costs. Conversely, accommodating this group by, as suggested by ICNIRP [179], acting to 'adjust the guidelines for the general population to include such groups' would not only lessen the negative impacts for people with EHS, but would also improve public health more broadly, given the other NIR-related health concerns that are highlighted in this paper.

Basing local tissue exposure limits on 1-g [3] or 10-g [5] cubes substantially underestimates the peak spatial SAR compared to basing local tissue exposure limits on smaller cubes (e.g., 100 mg or 10 mg), and therefore are not reliable dosimetric parameters to evaluate EMF absorption at frequencies above 1 GHz (Assumptions 11, 12). The volumes specified by the FCC and ICNIRP for local tissue SAR limits are too large to focus on stem cells which are important targets for carcinogenesis. To reduce health risks from exposures to RFR, limits for localized distribution of the SAR should be based on 100 mg, or preferably 10 mg cubes.

Another important deficiency raised in this paper is that neither the FCC nor ICNIRP addresses concerns for environmental effects of RFR on wildlife, even though there is extensive literature demonstrating the disrupting effects of RFR on wildlife behavior (Assumption 13).

The arbitrarily selected uncertainty/safety factors applied to the putative threshold SAR for RFR are woefully inadequate for protecting public health (Assumptions 9, 10). Based on the way the US Environmental Protection Agency, the International Council for Harmonization, and the National Institute for Occupational Safety and Health (US NIOSH) apply uncertainty/safety factors to a no-observed-adverse-effect level (NOAEL) in experimental animals [182–184], the safety factor for RFR would be at least 900 to 10,000, which is 18 to 200 times larger than the safety factor recommended by the FCC and ICNIRP for the general population. This large safety factor is based on adjustments for human variability, lifetime exposure from short-term studies, and database insufficiencies that include incomplete characterization of the toxicity of RFR. Clearly, the acute behavioral studies that served as the basis for the current exposure limits for RFR are not suitable for characterizing human health risks associated with long-term exposure to this type of radiation. The NCRP report from 1986 [6] and the ANSI/IEEE document from 1992 [7] recognized that when future studies on biological effects of RFR become available including effects of chronic exposures or evidence of non-thermal interactions there will be a need to evaluate and possibly revise exposure standards. When the FCC [3] and ICNIRP [5] reaffirmed their exposure limits from the 1990s, they dismissed the scientific evidence that invalidated the assumptions that underlie the basis for those exposure limits. An independent re-evaluation of RFR exposure limits based on the scientific knowledge gained over the past 25 years is needed and is long overdue. This evaluation should be performed by scientists and medical doctors who have no conflicting interests and who have expertise in RF-EMF exposure and dosimetry, toxicology, epidemiology, clinical assessment, and risk assessment. Special precautions should be taken to ensure that interpretations of health effects data and the setting of exposure limits for RFR are not influenced by the military or the telecommunications industry. In the meantime, manufacturers should be obliged to develop safer technologies [227].

Finally, we note our concern about the worldwide deployment of 5G communication networks for faster transfer of large amounts of data, but with no adequate health effects studies demonstrating the safety of high frequency millimeter waves. Because of limitations of the penetration and distance of travel of millimeter waves, dense networks of base stations are being mounted on structures such as utility poles in highly populated cities. Also, because the absorption of EMF at frequencies above 6 GHz is minimal, ICNIRP [5] has specified absorbed power density (S_{ab}) as the dosimetric parameter for "heating effects" at the higher frequencies. S_{ab} is a function of the incident power density (S_{inc}) and the input reflection coefficient (Γ). In near field scenarios, the S_{inc} does not have a singular value; this is largely due

to the heterogeneous nature of human body tissues and their relevant parameters (such as the permittivity, equivalent conductivity, mass density), which vary in different body regions and with frequency. Therefore, unless a powerful EMF simulation method together with realistic human models are used, the S_{inc} and the reflection coefficient values would be difficult to accurately estimate, making the resulting S_{ab} unreliable.

The assumption that 5G is safe at the power density limits recommended by ICNIRP (50 W/m^2 and 10 W/m^2 averaged over 6 min for occupational and 30 min for public exposures, respectively) because of its minimal penetration into the body does not justify the dismissal of the need for health effects studies prior to implementing 5G networks. The new communication networks will result in exposures to a form of radiation that has not been previously experienced by the public at large (Assumption 14). The implementation of 5G technology without adequate health effects information raises many questions, such as: Will exposure to 5G radiation: (i) compromise the skin's ability to provide protection from pathogenic microorganisms? (ii) will it exacerbate the development of skin diseases? (iii) will it increase the risk of sunlight-induced skin cancers? (iv) will it increase the risk of damage to the lens or cornea? (v) will it increase the risk of testicular damage? (vi) will it exert deeper tissue effects either indirectly following effects on superficial structures or more directly due to deeper penetration of the ELF components of modulated RF signals? (vii) will it adversely affect wildlife populations? Answers to these questions and others that are relevant to human and wildlife health should be provided *before* widespread exposures to 5G radiation occur, not afterwards. Based on lessons that should have been learned from studies on RFR at frequencies below 6 GHz, we should no longer rely on the untested assumption that current or future wireless technology, including 5G, is safe without adequate testing. To do otherwise is not in the best interest of either public or environmental health.

Abbreviations

ANSI: American National Standards Institute; CDMA: Code-division multiple access; dB: Decibel; DECT: Digital enhanced cordless technology; EHS: Electromagnetic hypersensitivity; ELF: Extremely low frequency; EMF: Electromagnetic field; FCC: Federal Communications Commission; FDA: Food and Drug Administration; GHz: Gigahertz; GBM: Glioblastoma multiforme brain cancer; GSM: Global system for mobile communication; IARC: International Agency for Research on Cancer; ICNIRP: International Commission on Non-Ionizing Radiation Protection; IEEE: Institute of Electrical and Electronics Engineers; LTE: Long Term Evolution (4G); MMW: Millimeter wave; NCRP: National Council on Radiation Protection and Measurements; NIR: Non-ionizing radiation; nT: Nanotesla; NTP: National Toxicology Program; 8-OHdG: 8-hydroxy-2'deoxyguanosine; psSAR: Peak spatial specific absorption rate; RFR: Radiofrequency radiation; ROS: Reactive oxygen species; SAR: Specific absorption rate; UMTS: Universal mobile telecommunications service (3G); UVR: Ultraviolet radiation; 5G: 5th generation wireless.

Supplementary Information

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Additional file 1: Appendix 1 Table 1. Studies demonstrating increased oxidative DNA damage and other indicators of oxidative stress at SAR < 4 W/kg.

Additional file 2: Appendix 2. On the Inadequacy of the psSAR Dosimetric Parameter at Frequencies above 1 GHz. **Table 1.** Electric permittivity and electric conductivity of the gray matter. **Figure 1.** A block of gray matter radiated by different frequencies. The highlighted cubes are of 10 g, 1 g, 100 mg and 10 mg. **Fig. 2.** A block of gray matter radiated by different frequencies. The highlighted cubes are of 10 g, 1 g, 100 mg and 10 mg. **Fig. 3.** Electric field intensity averaged in each cube for different frequencies: in the left axis, the electric field is in dB and in the right axis the electric field is in V/m normalized to 100 V/m.

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Authors' contributions

IB, AD, CF, LH, PH, KK, DM, EMB, RLM, and IY drafted the initial sections of this manuscript: by IB (factors affecting dosimetry), AD and CF (absorption in children versus adults, peak spatial specific absorption rate), LH (human brain cancer risk), KK (sperm damage), DM and DM (5G), EMB (electromagnetic hypersensitivity), RLM (cardiomyopathy, carcinogenicity, neurologic effects, safety factors), and IY (oxidative stress and DNA damage). IY prepared Appendix 1, and AD and CF prepared Appendix 2. The authors who drafted sections of the manuscript, as well as CB, KC, SD, EK, AM, JMM, and WS reviewed multiple manuscript drafts and made revisions. All authors reviewed and approved the final manuscript.

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Wireless and EMF Program
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To: Hon. Brett Guthrie, Chair
House Committee on Energy & Commerce

Hon. Frank Pallone, Ranking Member
House Committee on Energy & Commerce

Hon. Richard Hudson, Chair
House Subcommittee on Communications & Technology

Hon. Doris Matsui, Ranking Member
House Subcommittee on Communications & Technology

Members of the House Committee on Energy and Commerce
U.S. House of Representatives
2113 Rayburn House Office Building
Washington, DC 20515

January 12, 2026

Re: House Oversight Hearing to the FCC January 14, 2026- Questions for the FCC on Cell Phone and Wireless Radiation Transparency, Safety, and Compliance

Dear Chairman Brett Guthrie and Ranking Member Frank Pallone Jr., Chairman Hudson, Ranking Member Matsui, and Members of the Committee:

Environmental Health Sciences is a science-based nonprofit organization, and its Wireless and EMF Program is dedicated to advancing evidence-based, practical solutions to ensure that modern wireless technologies are deployed in ways that protect public health and the environment. Director of the EHS Wireless and EMF Program, Theodora Scarato just published a landmark policy review on the US regulation of wireless technologies entitled U.S. policy on wireless technologies and public health protection: Regulatory gaps and proposed reforms in the journal *Frontiers in Public Health as well as co-authored a review with U.S. experts on wildlife impacts entitled* Flora and fauna—How nonhuman species interact with natural and man-made EMF at ecosystem levels and public policy recommendations.[1,2] Both articles are attached to this letter and include robust policy recommendations to address current regulatory deficiencies.

[1] Scarato, T. (2025). U.S. policy on wireless technologies and public health protection: Regulatory gaps and proposed reforms. Frontiers in Public Health, 13, Article 1677583. https://doi.org/10.3389/fpubh.2025.1677583
[2] Levitt BB, Lai HC., Manville AM II, & ScaratoT. Flora and fauna—How nonhuman species interact with natural and man-made EMF at ecosystem levels and public policy recommendations. Frontiers in Public Health, 13. doi:10.3389/fpubh.2025.1693873

We respectfully urge the Committee to use its upcoming oversight hearing to question the Federal Communications Commission (FCC) on its lack of transparency, oversight, and enforcement regarding cell phone and wireless radiation safety. Substantial evidence from our Freedom of Information requests shows that the FCC has withheld critical safety information from the public, the courts, and policymakers, despite growing scientific evidence of harm and clear statutory obligations to protect public health.

This submission is intended to support the Committee's oversight responsibilities by identifying significant gaps in regulatory compliance, transparency, and public health protection related to federal wireless radiation policy.

Below are key specific questions we ask the Committee to raise with the FCC. This document includes background information with scientific references and more detailed questions.

1. How can the FCC fast-track cell towers when it has not responded to the 2021 D.C. Circuit Court mandate requiring the agency to explain how its cell tower and cell phone radiofrequency radiation exposure limits are adequately protective in light of mounting scientific evidence of harm. Details
2. How can the FCC provide public assurances of safety while no federal health or environmental agency is actively conducting comprehensive oversight of cell tower radiofrequency radiation exposures and when there is no premarket safety testing of wireless technologies nor post-market health surveillance? Details
3. Why did the FCC withhold its own laboratory test results, finding cell phone radiation exposure levels exceeding FCC radiation limits when phones were tested in body positions in positions of close contact (phone in a pocket), from the public? Details
4. Why did the FCC omit its cell phone radiation test results finding RF radiation that exceeded FCC limits from its court filings. Details
5. Why did the FCC omit its cell phone radiation test results, finding RF radiation that exceeded FCC limits, from its open rulemaking on RF radiation limits and rules? Details
6. Why is the FCC withholding its Apple iPhone 12 RF radiation measurement data? Details
7. How can the FCC fast-track cell towers, yet it lacks a national cell tower and wireless radiation measurement and monitoring program? Details
8. How can the FCC fast-track cell towers, yet it lacks adequate oversight, compliance, and enforcement mechanisms for cell towers and wireless facilities? Details
9. How can the FCC fast-track cell towers and wireless technologies, yet it lacks a robust oversight and enforcement program to protect workers from occupational radiofrequency radiation exposures? Details
10. Why is the FCC narrowing National Environmental Policy Act protections despite the fact that its rules omit protections for birds, bees, and trees, and that substantial science indicates ecological risks? Details
11. How can the FCC preempt health and environmental issues via Section 704 of the Telecommunications Act, despite continued reliance on outdated, and obsolete FCC exposure limits? Details
12. What is the FCC doing to compete on safety and promote already available wireless radiation exposure-reducing technologies? Details

The American public cannot make informed decisions about wireless technology when safety data are hidden, complaints are ignored, and oversight is virtually nonexistent. Transparency and accountability are not optional; they are fundamental to democracy.

We urge the Committee to press the FCC for clear answers and a concrete plan to bring U.S. wireless radiation regulatory policy in line with science and modern technologies.

Respectfully submitted,

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Additional FCC documents produced under the Freedom of Information Act are available upon request.

Background Facts and Additional Questions

1. The FCC Has Not Responded to the 2021 DC Circuit Court Mandate to Explain How its Cell Tower and Cell Phone Radiation Limits Are Adequately Protective Amidst Mounting Scientific Evidence of Harm

As a federal regulatory agency, the FCC is required to engage in reasoned decision-making and to ensure that its regulations adequately protect public health and the environment; however, the FCC has failed to respond to the D.C. Circuit's order in *EHT et al. v. FCC*[3] directing the agency to explain how its unchanged 1996 wireless RF radiation exposure limits protect children, address long-term and non-cancer health effects, and account for environmental impacts, despite record evidence concerning reproductive, endocrine, neurological, cardiovascular, developmental, and ecological harms. The court found the FCC did not show proper review of scientific evidence on its record, including impacts to memory, brain development, the studies indicating children's unique vulnerability, and research reporting impacts to the environment- birds, bees, and trees.

A central argument by petitioners is that FCC's wireless RF radiation exposure limits, adopted in 1996 and left unchanged for decades, are outdated and antiquated standards that were developed solely to prevent acute, short-term thermal effects, without consideration of long-term or cumulative exposures, contemporary wireless technologies, or the now-ubiquitous use of body-worn devices by children, whose patterns of exposure and biological vulnerability were neither anticipated nor evaluated at the time the limits were established.

The court noted that the FCC failed to respond to letters from the American Academy of Pediatrics urging an update to RF radiation limits to account for children's unique vulnerability, including their greater

[3] Environmental Health Trust v. Federal Communications Commission, 9 F.4th 893 (D.C. Cir. 2021). https://media.cadc.uscourts.gov/opinions/docs/2021/08/20-1025-1910111.pdf See also https://ehsciences.org/lawsuit-wireless-radiation-safety/

cumulative exposure into the brain[4], heightened biological sensitivity, and the modern pattern of cell phone and wireless device use in close proximity to the body.[5]

Children were not using cell phones in 1996, nor Wi-Fi and smart speakers. Recent studies have found that the placement of cell towers near schools increases children's baseline RF exposure[6], and that exposure is further elevated in classrooms densely populated with Wi-Fi devices, where multiple simultaneous emissions compound cumulative exposure levels.[7]

To date, the FCC has failed to provide any explanation as required by the court in 2021. In the meantime, a large and growing body of peer-reviewed science links cell phone and cell tower radiation to adverse health effects. [8][9][10][11][12] We have ensured this scientific evidence is submitted to the FCC[13] but have had no response from the FCC.

1. How can the FCC continue to promote and accelerate wireless densification, including 5G and 6G deployment, while it has failed to respond to the federal court's order in *EHT et al. v. FCC* requiring the agency to explain how its RF exposure limits protect public health, particularly children and against long-term exposure?
2. Why does the FCC continue to rely on and refuse to update its 1996 RF exposure limits, which are based largely on a small number of short-term animal studies involving less than one hour of exposure, despite decades of new scientific evidence on chronic, cumulative, and non-thermal effects of wireless radiation exposure?
3. How does the FCC justify relying on 1996 limits that were only designed to protect against short term health effects?
4. How can the FCC assert that its 1996 radiofrequency exposure limits adequately protect children's health when those limits were established before children routinely used wireless devices, do not account for children's higher relative absorption and lifelong cumulative

[4] Fernández, C., de Salles, A. A., Sears, M. E., Morris, R. D., & Davis, D. L. (2018). Absorption of wireless radiation in the child versus adult brain and eye from cell phone conversation or virtual reality. *Environmental Research*, *167*, 694–699.
[5] American Academy of Pediatrics Letters to the FCC, FDA and Members of Congress https://ehsciences.org/wp-content/uploads/2025/08/American-Academy-of-Pediatrics-Letters-to-FCC-and-Congress-on-cell-phone-radiation-health-effects-.pdf
[6] Lennart Hardell, Mona Nilsson. High Radiofrequency Radiation in the Surroundings of 10 Schools in Örebro. Fortune Journal of Health Sciences. 8 (2025): 306-310.
[7] Norton Escopelli Soares , Giovani Bulla , Claudio E. Fernández-Rodríguez , Alvaro A. A. de Salles. "SAR Estimations in a Classroom with Wireless Computers" Journal of Microwaves, Optoelectronics and Electromagnetic Applications, Vol. 24, No. 2, e2025288526 May 2025 DOI: http://dx.doi.org/10.1590/2179-10742025v24i3288526
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[9] International Commission on the Biological Effects of Electromagnetic Fields (ICBE-EMF), Belyaev I, Blackman C, et al. Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation: implications for 5G. *Environ Health*. 2022;21(1). doi:10.1186/s12940-022-00900-9
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[13] Regulatory Filings & Correspondence by Environmental Health Sciences https://ehsciences.org/regulatory-filings-correspondence-by-environmental-health-sciences/; Se ealso over 100 submissions by Theodora Scarato to the FCC at https://www.fcc.gov/ecfs/search/search-filings/results?q=(filers.name:(%22Scarato%22))

exposure, and were based solely on preventing short-term heating effects rather than long-term or developmental harms?

2. The FCC Provides Misleading Assurances of Safety While Lacking Active Federal Health Oversight of Cell Tower Radiation

The wireless industry has repeatedly invoked FCC authority and its assurances of safety despite the reality that federal health and environmental agencies are not reviewing the totality of the scientific evidence to ensure public health and environmental protection.[14][15] There is no FCC required premarket safety testing of wireless technologies for health effects, nor post-market health surveillance. New technologies are given the green light so long as RF emissions meet 1996 limits, despite such technologies and frequencies not even being in existence at that time.

In a letter[16] opposing proposed wireless safety bills in Massachusetts, CTIA asserted that *"the FCC's oversight of these issues was confirmed in October 2018 by FCC Commissioner Carr,"* quoting his statement that *"the FCC, as well as other agencies that are experts in health and safety issues, are always looking very closely at these issues, staying up to date on the latest science… and have reached the determination that these are safe."* CTIA further claimed that *"the consensus among health experts is that the weight of scientific evidence shows no known adverse health effects to humans from exposure to wireless antennas or devices."* **Neither of these statements is accurate, yet the FCC has taken no action to correct or disavow these representations.**

In *EHT et al. v. FCC*, the D.C. Circuit highlighted how the record showed that federal health and safety agencies did not provide any substantive, independent evaluation of the FCC's radiofrequency exposure limits or affirm their adequacy, despite the FCC's repeated claims of interagency consensus.[17] The Environmental Protection Agency abandoned non-ionizing radiation research decades ago; OSHA and NIOSH have no active RF health research or surveillance programs; the National Cancer Institute does not conduct risk assessments or make safety determinations[18]; the CDC has repeatedly funded industry

[14] Levitt BB, Lai HC., Manville AM II, & ScaratoT. Flora and fauna—How nonhuman species interact with natural and man-made EMF at ecosystem levels and public policy recommendations. Frontiers in Public Health, 13. doi:10.3389/fpubh.2025.169387
[15] Scarato T. U.S. policy on wireless technologies and public health protection: regulatory gaps and proposed reforms. Front Public Health (2025) In press.
[16] https://api.ctia.org/wp-content/uploads/2019/06/ctia-letter-in-opposition-to-massachusetts-s1272-amp-s1275-5g-facilities.pdf
[17] Environmental Health Trust v. Federal Communications Commission, 9 F.4th 893 (D.C. Cir. 2021). https://media.cadc.uscourts.gov/opinions/docs/2021/08/20-1025-1910111.pdf See also https://ehsciences.org/lawsuit-wireless-radiation-safety/ The August 2021 DC Circuit Court ruling states on page 15 that, "The silence of other expert agencies, however, does not constitute a reasoned explanation for the Commission's decision to terminate its notice of inquiry for the same reason that the FDA's conclusory statements do not constitute a reasoned explanation: silence does not indicate why the expert agencies determined, in light of evidence suggesting to the contrary, that exposure to RF radiation at levels below the Commission's current limits does not cause negative health effects unrelated to cancer. Silence does not even indicate whether the expert agencies made any such determination, or whether they considered any of the evidence in the record."https://ehsciences.org/lawsuit-wireless-radiation-safety/#LFCD-What-Fed-Agencies-Submitted
[18] National Cancer Institute. Clarification on NCI reviews. https://ehsciences.org/wp81 content/uploads/2025/05/National-Cancer-Insitute-Cell-phone-safety-Theodora-Scarato-.pdf

consultants to draft its webpages[19]; and the FDA has only shown limited review to narrow questions about cell phones while disclaiming jurisdiction over cell tower emissions. Despite the rapid expansion of wireless infrastructure and near-universal exposure to wireless (RF) radiation, in practice, no federal agency is currently conducting comprehensive, ongoing oversight to evaluate real-world cell tower radiofrequency radiation exposures or associated long-term health risks.

The FCC itself has repeatedly acknowledged that it is not a health agency stating[20] that, "since the Commission is not a health and safety agency, we defer to other organizations and agencies with respect to interpreting the biological research necessary to determine what levels are safe." Yet there is no federal agency conducting such activities. The FCC also does not routinely measure or monitor emissions, nor have a robust oversight program post-deployment, leaving a regulatory vacuum in which no federal entity is meaningfully responsible for evaluating cumulative exposures, long-term health effects, or compliance for cell towers and wireless facilities in today's dense wireless environment.

Moreover, there is not a scientific consensus for safety as hundreds of scientists and medical doctors recommend public exposure be reduced due to mounting scientific evidence.[21,22,23,24,25]
Public health regulation requires a reasoned evaluation of credible evidence indicating risk, particularly where exposures are widespread, involuntary, and long-term. Yet instead, the FCC is moving forward with proposals to fast-track cell towers, which will increase RF radiation exposure.

Questions regarding the absence of cell tower and wireless radiation health risk activities to ensure public safety.

1. As the FCC is not a health or environmental agency, and there are no federal health or environmental agencies actively evaluating cell tower radiation health risks, which entity is currently responsible for protecting the public from chronic, cumulative cell tower RF radiation exposure from cell towers?
2. Given the regulatory vacuum, how can the FCC credibly assure the public that its policies protect public health and the environment?
3. Why hasn't the FCC corrected the record, the industry statements and media?

[19] Centers for Disease Control and Prevention (CDC). CDC Grant to NCRP Released to Scarato under FOIA.(2025). Available online at: https://ehsciences.org/wp-content/uploads/2025/05/CDC-Grant-to-NCRP-Released-to-Scarato-under-FOIA-.pdf
[20] Federal Communications Commission (FCC). First Report and Order, Further Notice of Proposed Rule Making, and Notice of Inquiry. FCC 13-39. (2013) https://docs.fcc.gov/public/attachments/FCC-13-39A1.pdf
[21] Héroux P. Building the gulf of opinions on the health and biological effects of electromagnetic radiation. Front Public Health. 2025 Jul 23;13:1589021. doi: 10.3389/fpubh.2025.1589021. PMID: 40771236; PMCID: PMC12325042.
[22] Kelley, E., Blank, M., Lai, H., Moskowitz, J., & Havas, M. (2015). International Appeal: Scientists call for protection from non-ionizing electromagnetic field exposure. *European Journal of Oncology*, *Volume 20*, 180–182.
[23] Environmental Health Sciences. Doctors and scientists on cell phone radiation health effects. EHSciences.org. 2025. Available at: https://ehsciences.org/doctors-and-scientists-on-cell-phone-radiation-health-effects/
[24] Environmental Health Sciences, Scientific Appeals on Wireless and EMF Health Effects (2025) https://ehsciences.org/scientific-appeals-on-wireless-and-emf-health-effects/
[25] Santa Clara County Medical Association. Recommendations for Best Practices for Safe Technology in Schools. Santa Clara County Medical Association. 2023. Available at: https://www.sccma.org/Portals/19/LiveBlog/3697/SCCMA%20Best%20Practices%20for%20Safe%20Technology%20in%20Schools%20Recommendations%20%2021423.pdf?ver=CwFQFTHs4ZuDmjDYrsLXzQ%3d%3d

3. Why Did the FCC Omit its Cell Phone Radiation Test Results Finding High Levels That Exceed FCC Limits From the Public?

These systemic oversight failures are compounded by the FCC's repeated withholding of safety-relevant data from the public, the courts, and policymakers.

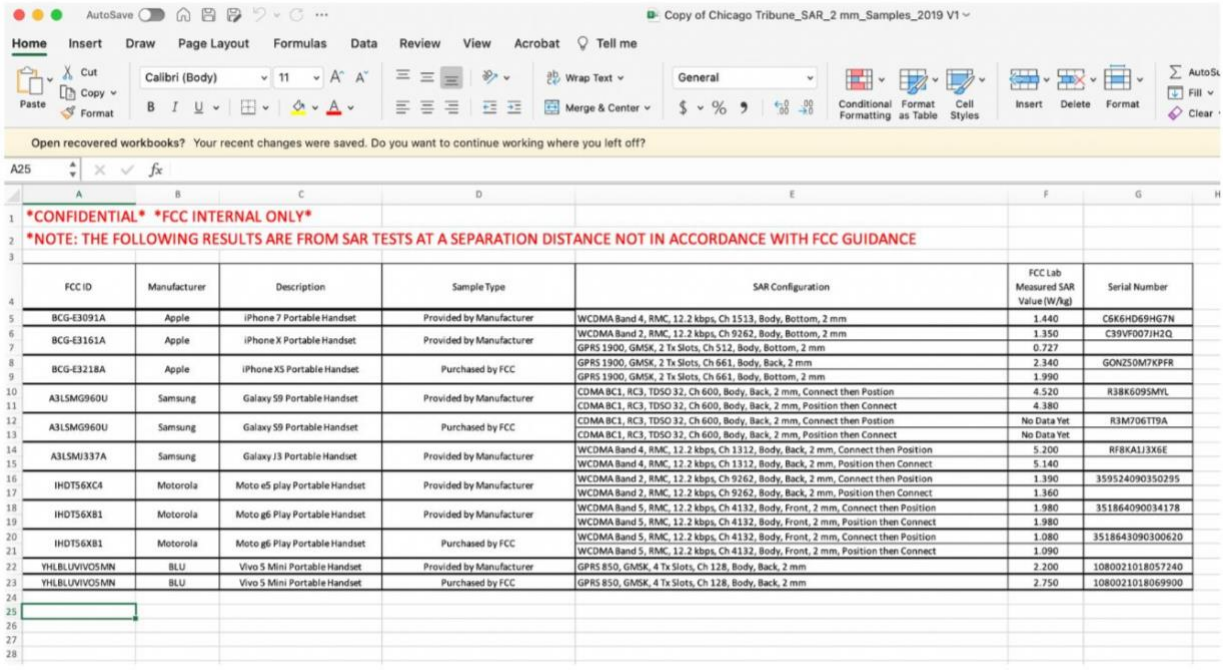
Background: Cell phones are tested for radiation compliance with the FCC's cell phone radiofrequency (RF) radiation exposure limit with SAR tests. SAR stands for the Specific Absorption Rate, and the SAR test places the cell phone in relation to a body phantom filled with a salt and sugar liquid. *Importantly*, FCC rules allow a separation distance (from 5 to 25 mm) *between the phone and body.* Cell phones are not required to be tested in body contact positions — like in a pocket or pressed to the abdomen — the way we use phones today. Manufacturers have long been able to choose the separation distance.

Research shows that cell phones radiation tested in body contact positions will exceed RF radiation limits, yet the FCC has so far refused to change its test requirement to ensure body contact (0 mm) tests for compliance.[26]

The Issue: After the Chicago Tribune's 2019 investigation[27] found that popular smartphones exceeded FCC wireless radiofrequency (RF) radiation limits when tested *closer to the body* (at 2 mm), the FCC conducted its own testing which found cell phone RF radiation levels exceeded the FCC limit when tested at 2 millimeter (mm) from the body, like a cell phone in the pocket—yet the FCC failed to disclose those results publicly or to the Tribune.[28]

The FCC cell phone test results found cell phone radiation SAR levels in the 2 mm tests as high as 5.2 W/kg -violating the FCC's limit of 1.6 W/kg *by over 3 times.* The FCC's letter states: "We observed that at a 2 mm separation distance, the FCC radiofrequency (RF) exposure limits were exceeded." The spreadsheet the FCC released stated "Confidential."

[26] Gandhi, O. P. (2019). Microwave Emissions From Cell Phones Exceed Safety Limits in Europe and the US When Touching the Body. *IEEE Access*, *7*, 47050–47052.
[27] We tested popular cellphones for radiofrequency radiation. Now the FCC is investigating. – Chicago Tribune https://www.chicagotribune.com/2019/08/21/we-tested-popular-cellphones-for-radiofrequency-radiation-now-the-fcc-is-investigating/
[28] FCC Cell Phone Radiation Tests Found High Radiation - Environmental Health Sciences https://ehsciences.org/fcc-cell-phone-radiation-tests-released-exposure-limits-were-exceeded/



Copy of Chicago Tribune_SAR_2 mm_Samples_2019 V1

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*NOTE: THE FOLLOWING RESULTS ARE FROM SAR TESTS AT A SEPARATION DISTANCE NOT IN ACCORDANCE WITH FCC GUIDANCE

FCC ID	Manufacturer	Description	Sample Type	SAR Configuration	FCC Lab Measured SAR Value (W/kg)	Serial Number
BCG-E3091A	Apple	iPhone 7 Portable Handset	Provided by Manufacturer	WCDMA Band 4, RMC, 12.2 kbps, Ch 1513, Body, Bottom, 2 mm	1.440	C6K6HD69HG7N
BCG-E3161A	Apple	iPhone X Portable Handset	Provided by Manufacturer	WCDMA Band 2, RMC, 12.2 kbps, Ch 9262, Body, Bottom, 2 mm	1.350	C39VF007JH2Q
				GPRS 1900, GMSK, 2 Tx Slots, Ch 512, Body, Bottom, 2 mm	0.727	
BCG-E3218A	Apple	iPhone XS Portable Handset	Purchased by FCC	GPRS 1900, GMSK, 2 Tx Slots, Ch 661, Body, Back, 2 mm	2.340	GONZ50M7KPFR
				GPRS 1900, GMSK, 2 Tx Slots, Ch 661, Body, Bottom, 2 mm	1.990	
A3LSMG960U	Samsung	Galaxy S9 Portable Handset	Provided by Manufacturer	CDMA BC1, RC3, TDSO 32, Ch 600, Body, Back, 2 mm, Connect then Postion	4.520	R38K6095MYL
				CDMA BC1, RC3, TDSO 32, Ch 600, Body, Back, 2 mm, Position then Connect	4.380	
A3LSMG960U	Samsung	Galaxy S9 Portable Handset	Purchased by FCC	CDMA BC1, RC3, TDSO 32, Ch 600, Body, Back, 2 mm, Connect then Postion	No Data Yet	R3M706TT9A
				CDMA BC1, RC3, TDSO 32, Ch 600, Body, Back, 2 mm, Position then Connect	No Data Yet	
A3LSMJ337A	Samsung	Galaxy J3 Portable Handset	Provided by Manufacturer	WCDMA Band 4, RMC, 12.2 kbps, Ch 1312, Body, Back, 2 mm, Connect then Position	5.200	RF8KA1J3X6E
				WCDMA Band 4, RMC, 12.2 kbps, Ch 1312, Body, Back, 2 mm, Position then Connect	5.140	
IHDT56XC4	Motorola	Moto e5 play Portable Handset	Provided by Manufacturer	WCDMA Band 2, RMC, 12.2 kbps, Ch 9262, Body, Back, 2 mm, Connect then Position	1.390	359524090350295
				WCDMA Band 2, RMC, 12.2 kbps, Ch 9262, Body, Back, 2 mm, Position then Connect	1.360	
IHDT56XB1	Motorola	Moto g6 Play Portable Handset	Provided by Manufacturer	WCDMA Band 5, RMC, 12.2 kbps, Ch 4132, Body, Front, 2 mm, Connect then Position	1.980	351864090034178
				WCDMA Band 5, RMC, 12.2 kbps, Ch 4132, Body, Front, 2 mm, Position then Connect	1.980	
IHDT56XB1	Motorola	Moto g6 Play Portable Handset	Purchased by FCC	WCDMA Band 5, RMC, 12.2 kbps, Ch 4132, Body, Front, 2 mm, Connect then Position	1.080	351864090300620
				WCDMA Band 5, RMC, 12.2 kbps, Ch 4132, Body, Front, 2 mm, Position then Connect	1.090	
YHLBLUVIVO5MN	BLU	Vivo 5 Mini Portable Handset	Provided by Manufacturer	GPRS 850, GMSK, 4 Tx Slots, Ch 128, Body, Back, 2 mm	2.200	1080021018057240
YHLBLUVIVO5MN	BLU	Vivo 5 Mini Portable Handset	Purchased by FCC	GPRS 850, GMSK, 4 Tx Slots, Ch 128, Body, Back, 2 mm	2.750	1080021018069900

The FCC also tested cell phones at the separation distances the manufacturer chose (from 5 to 15 mm) and these tests showed radiation levels *compliant with FCC limits.* The FCC then issued a December 19, 2019, report which only shared the 5 to 15 mm test data, and omitted the FCC's radiation 2 mm pocket radiation tests. The Chicago Tribune then ran a follow up article the next day stating that the FCC found "no evidence of violations of any FCC rules" for the safety limit," which ended by stating "the FCC's recent study did not test phones at 2 mm distance" even though the FCC, had in fact, tested cell phones at 2 mm distance.

Questions to ask the FCC about its transparency to the American public

1. Why did the FCC release a report with only the compliant test data using larger manufacturer-selected distances (5–15 mm), while omitting the results showing exceedances of the FCC limit?
2. Why did the FCC not correct the public record when media reports (the Chicago Tribune) inaccurately stated that the FCC had not tested phones at 2 mm?
3. What is the basis for years of withholding factual testing data that directly relates to consumer safety and RF radiation exposure affecting millions of Americans?

4. Why Did the FCC Omit its 2 mm Cell Phone Radiation Test Results from Its Court Filings?

The FCC also omitted its 2 mm cell phone radiation test findings in their court statement of interest filings in the Apple v. Cohen case in which plaintiffs alleged that cell phones emitted excessive

radiation[29] and also in its court filings for the CTIA v. City of Berkeley case in which the CTIA Wireless Industry sued the city of Berkeley for its Cell Phone Right to Know ordinance which informed people at point of sale that phones could exceed radiation limits if not used with the separation distance.[30]

Questions to ask the FCC about its legal filings.

1. Why did the FCC omit its own 2 millimeter (mm) body-contact cell phone radiation test findings—which showed phones exceeding federal SAR limits—from its statements in Apple v. Cohen and CTIA v. City of Berkeley?
2. Given that these legal proceedings directly concerned cell phone radiation in close body conditions, how does the FCC justify withholding its own test results that demonstrated radiation limit exceedances when phones were tested as people actually use them, close to the body?

5. Why Did the FCC Omit its 2 mm Cell Phone Radiation Test Results From Its Open Rulemaking on RF Rules?

The FCC also omitted its 2 mm tests from its then open rulemaking on RF limits, which notably specifically requested comment on the cell phone radiation test procedures that allow manufacturers to use a separation distance. The 2013 FCC inquiry[31] asked, "Specifically, we seek comment on the feasibility of evaluating portable RF sources without a separation distance when worn on the body to ensure compliance with our limits under present-day usage conditions."

But instead of transparently sharing its 2 mm cell phone radiation data, the FCC stated in its December 4, 2019 decision to maintain its 1996 human exposure limits for RF that they were opposed to requiring manufacturers to premarket testing phones in body contact positions. The FCC concluded that "Even though some parties claim that the RF exposure evaluation procedures for phones should require testing with a "zero" spacing – against the body – this is unnecessary."[32]

The FCC then proceeded to withhold test data from the subsequent federal case EHT et al v. FCC United States Court of Appeals for the District of Columbia, Case Nos. 20-1025; 20-1138 (now on Remand)[33], which Theodora Scarato, director of the Wireless and EMF Program at Environmental Health Sciences is a petitioner in, despite the fact that the issue of the cellphone test set up that allows a separation distance was central to the case.[34]

[29] https://ehsciences.org/wp-content/uploads/2025/07/FCC-statement-of-interest-in-Apple-v-Cohen-April-13-2020-.pdf
[30] https://ehsciences.org/wp-content/uploads/2025/07/FCC-Statement-of-Interest-in-CTIA-v-Berkeley-06222020.pdf
[31] https://docs.fcc.gov/public/attachments/FCC-13-39A1.pdf
[32] https://docs.fcc.gov/public/attachments/FCC-19-126A1.pdf
[33] Environmental Health Trust v. Federal Communications Commission, 9 F.4th 893 (D.C. Cir. 2021). https://media.cadc.uscourts.gov/opinions/docs/2021/08/20-1025-1910111.pdf See also https://ehsciences.org/lawsuit-wireless-radiation-safety/
[34] https://ehsciences.org/lawsuit-wireless-radiation-safety/

Questions to ask the FCC about its transparency to the public and court regarding its rules for cell phone RF radiation compliance testing.

1. Given that the FCC NPRM directly asked if phones should be tested in body-contact conditions, how does the FCC justify withholding its own test results from its NPRM and court submissions in *Environmental Health Trust et al. v. FCC* that demonstrated limit exceedances when phones were tested in close body positions?

6. The FCC Lacks Oversight and Transparency for Cell Phone Radiation and is Withholding of the Apple iPhone 12 RF Radiation Measurements

In addition to the FCC's 2 mm cell phone SAR testing, we have filed multiple Freedom of Information requests seeking records of FCC-conducted cell phone radiation testing to understand the scope of the FCC's post-market surveillance and oversight of wireless devices. Through these requests, I obtained internal FCC records showing that the agency conducted only minimal surveillance testing, as approximately four cell phone surveillance tests were released when we requested surveillance activities for the time period of January 1, 2020 through November 22, 2024.[35]

France has addressed the excessive radiation of over 64 wireless devices, but the US has shown no similar oversight. France, in contrast to the USA is required to publicly release their cell phone radiation SAR test results and non-compliance findings. France has a robust post-market surveillance program that routinely tests cell phones to ensure compliance, and to date, France has required corrections or withdrawals for more than 64 cell phone or wireless device models. See the French government ANFR cell phone radiation test database here.[36] In fact, just recently ANFR was ordered to release tests it had omitted from this database thanks to the transparency work of the Phonegate Association.[37] Yet the FCC continues to withhold significant radiation and consumer safety information from U.S. consumers.

Released internal documents from Freedom of Information requests indicate that the FCC tested the Apple iPhone 12 in its own laboratories after France found radiation exceedances, yet the FCC has refused to release the Apple iPhone 12 radiation testing report and the underlying SAR measurement data from the tests, repeatedly invoking Exemption 5 even though it includes factual information.

[35] https://ehsciences.org/wp-content/uploads/2025/09/FCC-FOIA-Control-No.-2025-000263-Scarato-SAR-tests-.pdf
[36] https://data.anfr.fr/visualisation/table/?id=das-telephonie-mobile
[37] https://phonegatealert.org/en/the-cada-rules-in-favor-of-phonegate-alert

From: Dusmantha Tennakoon
To: Jake Novicky; Reza Biazaran; Alfonso Tarditi
Subject: RE: iPhone 12 SAR Surveillance Report
Date: Thursday, March 14, 2024 8:36:21 AM

Jake – after preliminary review of the report I have the following thoughts:

(b) (5) [redacted]

From: Jake Novicky
Sent: Wednesday, March 13, 2024 1:09 PM
To: Dusmantha Tennakoon ; Reza Biazaran ; Alfonso Tarditi
Subject: iPhone 12 SAR Surveillance Report

Greetings,
I have finished with the draft iPhone 12 SAR Surveillance Report. It is in the draft stage and should be reviewed by an engineer and management before being ready for distribution. It is on the K: drive here: (b) (5) [redacted]

Best Regards,
Jake Novicky
Electronics Engineer
Federal Communications Commission
Office of Engineering and Technology Laboratory Division
7435 Oakland Mills Rd.
Columbia, MD 21046-1609
Phone: 301-362-3027
Fax: 301-362-3290
Email: Jake.Novicky@fcc.gov

Questions to ask about the scope of the FCC's Oversight for Cell Phone Radiation Tests and the Apple iPhone 12 Tests.

1. What post-market surveillance and oversight program does the FCC maintain to ensure that cell phones remain compliant with RF exposure limits after they are authorized for sale? S*pecifically, how many phones are tested each year, what criteria are used to select devices for testing, what testing distances and methodologies are employed, and on what timeline are such surveillance tests conducted and reported? Additionally, what procedures are in place to ensure transparency and public disclosure of the results of any post-market compliance testing?*
2. Why does the FCC not operate a publicly accessible cell phone radiation SAR compliance and enforcement program that publishes all pre-market and post-market cell phone SAR test results, clearly identifies non-compliant devices, and transparently discloses any enforcement actions taken to protect consumers?
3. Why is the FCC refusing to release the Apple iPhone 12 RF radiation SAR test measurements**?**

7. The FCC Lacks a National Measurement and Monitoring Program

The FCC does not maintain a national RF radiation measurement and environmental monitoring program, despite the rapid expansion of wireless infrastructure, dense small-cell deployment, and widespread 5G rollout. This absence represents a significant gap in federal oversight. Decades ago, the United States operated a national RF measurement and monitoring program that collected real-world exposure data; however, this program was discontinued and never replaced. The EPA published the last publicly available measurement report in 1986. A 2018 multi-country study[38] found RF environmental measurements in Los Angeles, California at 70 times higher than levels measured in City in the late '70s, as part of a twelve-city study[39] referenced in the 1986 EPA report. Decades ago, TV and FM radio broadcast antennas were the dominant contributors to environmental RF exposures. **Today the RF emissions from cellular base station antennas (cell towers and 4G/5G facilities) are the dominant contributor to ambient RF exposures in most outdoor areas.**

The FCC's approach is essentially the honor system. The FCC relies almost exclusively on pre-market compliance testing conducted by or for manufacturers, with minimal post-market surveillance and no systematic collection of real-world exposure data. This approach stands in stark contrast to practices in numerous other countries, which conduct ongoing environmental RF measurements, publish monitoring results, track changes in population exposure over time, and use this data to inform policy and enforcement decisions.

Without a national monitoring program, the FCC lacks confirmation of compliance and empirical data on cumulative, ambient, and long-term RF exposure levels experienced by the public—particularly in homes, schools, and communities subject to dense wireless deployments. The absence of such a program undermines transparency, prevents independent verification of safety assumptions, and leaves the public without basic information about their exposure.

Questions regarding the lack of a robust measurement and monitoring program:

1. Why has the FCC abandoned a basic national RF radiation measurement and monitoring function that previously existed?
2. What statutory, budgetary, or policy decisions led to the defunding or elimination of this program, and why has it not been reinstated despite dramatic increases in wireless networks?
3. How does the FCC assess real-world, cumulative RF exposure in the absence of systematic environmental measurements?
4. How can the FCC credibly assure the public that its exposure limits are protective without collecting data to assess public exposures and monitor health and environmental impacts
5. Why does the FCC not publish routine, location-based RF exposure measurements to enable public transparency and independent scientific review?

[38] Sagar, Sanjay, Seid M. Adem, Benjamin Struchen, Sarah P. Loughran, Michael E. Brunjes, Lisa Arangua, Mohamed Aqiel Dalvie, et al. 2018. "Comparison of Radiofrequency Electromagnetic Field Exposure Levels in Different Everyday Microenvironments in an International Context." Environment International 114 (May): 297–306. https://doi.org/10.1016/j.envint.2018.02.036.
[39] Tell, Richard A., and Edwin D. Mantiply. 1982. "Population Exposure to VHF and UHF Broadcast Radiation in the United States." Radio Science 17 (5S): 39S-47S. https://doi.org/10.1029/RS017i05Sp0039S.

8. The FCC lacks oversight regarding compliance and enforcement for cell towers and wireless facilities.

Numerous countries conduct routine audits of cell tower sites to ensure compliance with RF exposure limits.[40,41,42,43,44,45,46] These programs often include spot checks of a defined percentage of cell towers and wireless sites each year, mandatory reporting, and in some cases, continuous national monitoring of ambient emissions. Further, the results are often publicly posted on easy-to-understand websites.

By contrast, the United States has no comparable national auditing, monitoring, or enforcement program. The FCC has not demonstrated that it conducts systematic inspections, routine spot checks, or any ongoing compliance verification of operational cell towers. The FCC has yet to fully respond to our repeated Freedom of Information requests[47] for enforcement actions and responses to RF-related complaints.

Out-of-compliance wireless facilities have been documented, especially in regards to rooftop sites which have been documented as failing to meet RF exposure compliance regulations for RF radiation exposure and also for issues like proper signage and containment of the high RF radiation exposure areas.[48,49]

As an example, a 2021 RF study that was part of a petition submitted to the U.S. Health and Human Services[50] used professional-grade calibrated spectrum management tools to measure RF levels in a rooftop lounge area, where people sunbathe, as it is next to wireless antennas, and they documented significant RF exceedances. According to their Crest Factor analysis, the emissions routinely spiked to 132-to-264% beyond the FCC Human RF exposure standard. This situation likely reflects a systemic issue with rooftop installations nationwide.

- What is the FCC doing to ensure cell tower and rooftop antenna compliance, given documented cases of RF exposure exceeding both public and occupational limits?
- Why does the FCC rely almost entirely on industry self-certification, conduct no routine audits, perform no random spot checks, and rarely investigate complaints related to cell tower RF

[40] France **https://www.anfr.fr/maitriser/information-du-public/observatoire-des-ondes**
[41] Brazil https://informacoes.anatel.gov.br/paineis/espectro-e-orbita/mapa-de-exposicao-a-campos-eletromagneticos
[42] Switzerland https://map.geo.admin.ch/#/map?lang=en&center=2660000,1190000&z=1&topic=funksender&layers=ch.bakom.standorte-mobilfunkanlagen&bgLayer=ch.swisstopo.pixelkarte-farbe&catalogNodes=funksender,403,408
[43] Greece https://paratiritirioemf.eeae.gr/en/
[44] China https://www.itu.int/dms_pub/itu-d/oth/07/16/D07160000060001PDFE.pdf
[45] United Kingdom https://www.ofcom.org.uk/spectrum/electromagnetic-fields/mobile-base-station-audits
[46] Bahrain https://safetymeasurements.tra.org.bh/
[47] FOIAs filed on
[48]Spectrum Cellular Management https://spectrumcm.com/about/
[49] Dugan, I. J., & Knutson, R. (2014, October 2). *Cellphone boom spurs antenna-safety worries: Many sites violate rules aimed at protecting workers from excessive radio-frequency radiation*. *Wall Street Journal*. https://www.wsj.com/articles/cellphone-boom-spurs-antenna-safety-worries-1412293055
[50] Americans for Responsible Technology Petition to Health and Human Services, page 225 statement by Sally Jewell Coxe and ATTACHMENT 1 RF Exposure Analysis: 2701 Connecticut Avenue, NW, Washington, DC by Cardinal Communications, a Division of Thought Delivery Systems, Inc. for THE BALANCE GROUP, https://ehsciences.org/wp-content/uploads/2025/12/2021-12-21-HHS_FDA-Petition-Final-Filed.pdf

radiation despite evidence of widespread non-compliance, particularly with higher-powered 5G installations?

- What is the FCC's process for receiving, investigating, and resolving RF exposure complaints, and why are all RF complaints, investigative findings, and agency responses not made publicly available?

9. The FCC Lacks an Adequate Oversight and Enforcement to Protect Workers From Occupational Exposures

Cell tower climbers, maintenance workers, broadcast technicians, utility workers, firefighters, and construction crews are increasingly subject to involuntary occupational radiofrequency (RF) exposure as wireless infrastructure rapidly densifies. Cell tower climbers have reported RF overexposure incidents[51], and a peer-reviewed case study published in the journal *Multiple Sclerosis and Related Disorders*[52] documented a worker with intense RF exposure who later developed neurological symptoms mimicking multiple sclerosis (MS) years after the initial exposure. **The FCC's occupational RF exposure limits, which allow workers to be exposed to up to five times the level permitted for the general public, are highly questionable**, particularly given the absence of routine monitoring, EMF measuring, medical surveillance, or enforcement, and the growing evidence of adverse health effects associated with RF exposure. The lack of a robust occupational RF radiation protection program in the U.S.A. leaves the true number of exposed and injured workers unknown and raises serious questions about how the FCC can determine whether its regulations are protective in real-world occupational settings.

Theodora Scarato's American Public Health Association (APHA) 2025 presentation documents that occupational RF exposure is now widespread across multiple job categories, from education and healthcare to retail, construction, emergency response, and telecommunications, and increasingly unavoidable in the modern workplace.[53,54] These exposures occur without routine monitoring, medical surveillance, or meaningful enforcement and are governed by outdated 1996 federal limits that fail to account for chronic, cumulative, and non-thermal biological effects documented in the scientific literature.[55]

Questions regarding the FCCS inadequate oversight for occupational RF exposures

1. Why are FCC RF radiation exposure limits for workers based solely on effects from short-term exposure when workers in modern workplaces are exposed daily to continuous RF radiation?

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[51] Tommy Schuch, founder of Climber Protection Group https://climberprotectiongroup.org/ documentary Why RF Safety Needs Regulation in the Tower Industry https://www.youtube.com/watch?v=DNvQo6JPO54

[52] Raefsky SM, Chaudhari A, Sy MY. Delayed-Onset multiphasic demyelinating lesions after high dose radiofrequency electromagnetic field exposure: A multiple sclerosis (MS) mimic. Mult Scler Relat Disord. 2020 Oct;45:102318. doi: 10.1016/j.msard.2020.102318.

[53] Stam R. Occupational exposure to radiofrequency electromagnetic fields. *Ind Health*. 2021;60(3):201-215. doi:10.2486/indhealth.2021-0129

[54] Environmental Health Sciences *Protecting Workers from Non-Ionizing EMF Exposure: A Call for Federal Oversight.November 2, 2025, American Public Health Association*, ***Occupational Health and Safety Section Poster. (2025) https://ehsciences.org/protecting-workers-from-non-ionizing-emf-exposure-a-call-for-federal-oversight/***

[55] International Commission on the Biological Effects of Electromagnetic Fields (ICBE-EMF), Belyaev I, Blackman C, et al. Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation: implications for 5G. *Environ Health*. 2022;21(1). doi:10.1186/s12940-022-00900-9

2. Why do FCC RF radiation exposure limits for workers allow higher RF exposures, especially in today's dense wireless environment where worker do not have as much control over the exposure.
3. What measures does the FCC require to protect cell tower climbers and maintenance workers from excessive radiofrequency (RF) exposure, given documented incidents of overexposure, injuries, and fatalities (including antenna shut-down procedures, lock-out/tag-out requirements, real-time RF monitoring, and post-exposure medical evaluation)
4. How does the FCC provide oversight and verify compliance in the field rather than relying on carrier self-reporting
5. How does the FCC verify compliance with occupational RF limits in the field, rather than relying on carrier self-certification and theoretical modeling?
6. How many inspections, audits, or enforcement actions related to occupational RF overexposure has the FCC conducted in the past five years?
7. Given that virtually all workers are now exposed to ambient RF radiation, what steps is the FCC taking to update its standards, monitoring, and enforcement to reflect real-world occupational conditions rather than theoretical compliance?

10. The FCC is Narrowing NEPA Protections Despite RF Related Rules That Omit Protections for Wildlife and Habitat

The FCC has moved to narrow and essentially eliminate most of the protections of the National Environmental Policy Act (NEPA) for wireless infrastructure via two proposed rulemakings, both "Modernizing the Commission's National Environmental Policy Act Rules", WT Docket No. 25- 217[56] and "Build America: Eliminating Barriers to Wireless Deployments, WT Docket No. 25-276,[57] at the same time that peer-reviewed scientific evidence documenting serious impacts to the environment, to flora and fauna, continues to grow. Studies have reported impacts to plants and trees [58,59,60,61,62] as well as a wide range of impacts to animals, including to their orientation, migration, reproduction, mating,

[56]FCC NPRMModernizing the Commission's National Environmental Policy Act Rules Notice of Proposed Rulemaking – WT Docket No. 25-217 2025 https://docs.fcc.gov/public/attachments/DOC-413047A1.pdf and https://www.federalregister.gov/documents/2025/08/19/2025-15818/modernizing-the-commissions-national-environmental-policy-act-rules
[57] FCC NPRM Build America: Eliminating Barriers to Wireless Deployments WT Docket No. 25-276 Released: September 30, 2025 https://docs.fcc.gov/public/attachments/FCC-25-67A1.pdf
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nesting, den building, habitat and survivorship.[63,64,65] Newer technologies with higher frequencies are creating unique risks for honeybees and other insect pollinators as the frequencies are more highly absorbed into their smaller bodies.[66,67,68,69] Wildlife biologists are urgently calling for updated exposure limits along with safeguards for flora and fauna.[70,71,72,73]
Despite rising environmental levels, the FCC limits are solely designed to ensure protection for humans, not flora or fauna. FCC protections for birds, bees, trees and wildlife simply do not exist. This is a critical regulatory gap. Further, FCC RF compliance procedures entirely fail to protect wildlife, plants and trees as cell towers and base station antennas are allowed to have non-compliance zones that extend sometimes over 50 -100 feet, creating hazardous exposures for the animals that live in the air or in trees near the infrastructure. Yet consideration of these flora and fauna impacts is omitted from evaluations during the application process.

In its 2021decision, the DC Circuit stated that the FCC had "completely failed even to acknowledge, let alone respond to, comments concerning the impact of RF radiation on the environment," highlighting a U.S. Department of Interior letter which detailed published studies showing RF impacts to birds. The letter states that "There is a growing level of anecdotal evidence linking effects of non-thermal, non-ionizing electromagnetic radiation from communication towers on nesting and roosting wild birds and other wildlife." It further stated, "the electromagnetic radiation standards used by the Federal

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[70] Jérémy S. P. Froidevaux, Laura Recuero Virto, Marek Czerwiński, Arno Thielens, and Kirsty J. Park Addressing Wildlife Exposure to Radiofrequency Electromagnetic Fields: Time for Action Environmental Science & Technology Letters, 2024, 11, 1, 3–4
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Communications Commission (FCC) continue to be based on thermal heating, a criterion now nearly 30 years out of date and inapplicable today."[74]

Questions regarding the FCC Narrowing of NEPA Protections

1. How can the FCC justify limiting or eliminating NEPA review for wireless infrastructure when there is mounting peer-reviewed evidence of RF radiation impacts on wildlife and the environment, and when the agency regulations do not pertain to impacts on flora and fauna?
2. If the FCC is not a health or environmental agency, and no other federal agency is actively evaluating environmental risks (flora and fauna) from chronic RF radiation exposure, which federal agency is currently responsible for ensuring that accelerated wireless deployment does not cause environmental harm?

11. Federal Preemption Under Section 704 of the Telecom Act Silences Health and Environmental Concerns Despite Outdated and Obsolete FCC Limits

Despite the growing body of peer-reviewed scientific evidence which indicates that the FCC's rules are inadequate, Section 704[75] of the Telecommunications Act of 1996 prohibits state and local governments from "regulating the placement, construction, or modification of personal wireless service facilities on the basis of the environmental effects of RF emissions, so long as such facilities comply with FCC regulations." This provision has been interpreted by some courts as a federal preemption, functioning in practice as a de facto "RF gag rule" to decisionmakers that shields the wireless industry.[76,77,78]

As a result, public discussion of health and environmental concerns related to RF radiation is effectively silenced during cell tower siting proceedings, and industry frequently invokes the threat of litigation when issues of health are raised (such as in cell towers going up near schools, daycares and homes).

This situation reflects a serious failure of governance: federal agencies have failed to conduct timely, rigorous scientific reviews, yet policymakers and local officials are effectively prohibited from acknowledging or addressing potential risks because federal standards remain outdated. Section 704 not only restricts state and local decision-makers from considering health or environmental concerns when siting wireless facilities near schools and homes, but also forecloses meaningful judicial review and due process, leaving communities without any practical mechanism to prevent harm and respond to legitimate health, safety, and ecological concerns related to cell tower siting.

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[74] https://www.ntia.doc.gov/files/ntia/us_doi_comments.pdf
[75] https://www.congress.gov/104/plaws/publ104/PLAW-104publ104.pdf
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12. The FCC Has Not Competed on Safety in the Race to Deploy Wireless Infrastructure nor Promoted Available RF Exposure-Reducing Technologies

The FCC is racing to fast-track cell towers and wireless deployment without comparably promoting innovation in device and network design that would reduce wireless RF radiation exposure. Peer-reviewed research demonstrates that wireless technologies can be engineered to substantially reduce RF radiation exposure through design choices such as optimized antenna configurations, miniaturized MIMO systems, power control, and deploying wired Ethernet and corded alternatives with exposure-conscious building design—particularly for schools and residential settings.[79, 80,81]

Engineering solutions for cell phones have been proposed by experts of the International Commission on the Biological Effects of Electromagnetic Fields that are simple and would drastically reduce exposure to cell phones.[82] Several publications document research focused on engineering design to reduce RF radiation. Researchers have found, as an example, the miniaturization of the MIMO mobile terminal antenna could significantly reduce wireless RF radiation absorption into head tissues: 85.51% in the scalp, 85.62% in the skull, 89.02% in the cerebrum, 93.04% in the cerebellum, and 88.02% in the brainstem.[83]

Despite the feasibility of these urgently needed solutions[84], the FCC has not fast-tracked safer technologies or incentives for exposure-minimizing designs and the related research and design needed. Instead, current FCC policies prioritize speed and cost *over* public and environmental health, allowing market forces to sideline safer designs rather than encouraging competition on safety.

Questions Regarding the FCC's Failure to Compete on Safety

- What is the FCC doing to ensure that U.S. companies are competing on safety, including the development, deployment and promotion of low and no RF radiation emitting communication technologies?
- How does the FCC justify fast-tracking cell towers without comparably promoting or incentivizing technologies that significantly reduce RF radiation exposure or have no RF

[79] Clegg, F. M., Sears, M., Friesen, M., Scarato, T., Metzinger, R., Russell, C., Stadtner, A., & Miller, A. B. (2020). Building science and radiofrequency radiation: What makes smart and healthy buildings. *Building and Environment*, *176*, 106324
[80]Theodora Scarato November 2, 2025**,** American Public Health Association, Occupational Health and Safety Section Poster https://ehsciences.org/addressing-cell-towers-at-schools-science-based-policy-health-risks/
[81] Collaborative on High Performance Schools Low EMF Best Practices Summary https://ehsciences.org/wp-content/uploads/2025/12/Collaborative-on-High-Performance-Schools-Low-EMF-Best-Practices-Summary-.pdf
[82] Héroux P, Belyaev I, Chamberlin K, Dasdag S, De Salles AAA, Rodriguez CEF, Hardell L, Kelley E, Kesari KK, Mallery-Blythe E, et al. Cell Phone Radiation Exposure Limits and Engineering Solutions. International Journal of Environmental Research and Public Health. 2023; 20(7):5398.
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[84] Habash R, Baho GY. Transition Pathways Towards Electromagnetic Sustainability in the Built and Lived Environment. *Sustainability*. 2025; 17(22):10252. https://doi.org/10.3390/su172210252

radiation emissions (such as hardwired ethernet), despite peer-reviewed evidence that relatively simple engineering modifications can substantially reduce RF absorption into the brain?

- What concrete steps, if any, has the FCC taken to incentivize RF exposure-reducing technologies for sensitive populations, including use by children in schools, homes, and other sensitive environments?