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This letter is in support of the Citizen Petition and Request for Legal Compliance with the Legal Obligations of the FDA Regarding Public Exposure to Non-Ionizing Radiation from Electronic Products submitted by Americans for Responsible Technology and other Petitioners.

My name is Camilla Rees. I was seriously injured by Radiofrequency Radiation (RF) exposures on several occasions dating back over 15 years. Initially, by using a cell phone against my head, then severely impacted by a neighbor's wireless router that was on the other side of a wall from my pillow for several months, as well as in two office environments. As a result, I have dedicated much of my time to educating about cell phone and wireless risks through Manhattan Neighbors for Safer Telecommunications, ElectromagneticHealth.org and through policy work via the National Institute for Science, Law and Public Policy in Washington, D.C. By strictly limiting RF exposures I function well today, but this required me to retreat from city life, take time off to restore my health, and to live in an area without commercial activity, to a great degree, relatively speaking, very isolated. The quality of my daily life and career potential have been significantly impacted.

Like millions of Americans, when I first started using a cell phone I assumed the FDA had thoroughly evaluated cell phones for safety. I assumed the same about other electronic devices and equipment emitting Radiofrequency Radiation, such as computers, wireless routers, tablets, smart meters, etc. When cell towers increasingly appeared in cities, on highways, and when antennas appeared in residential neighborhoods on utility poles, near 2nd floor bedroom windows, I assumed the same--that this technology would not have been allowed on the market were it known to be dangerous for human or environment health.

I never imagined that volumes of science showing risk from this radiation would be suppressed in this country, with politicians and regulators turning a blind eye to very serious risks, as happened decades ago with tobacco risks, but this is what I found. I trusted that when it came to public health a genuine commitment to integrity existed in the United States at the FDA.

- *I assumed, incorrectly, that the FDA had reviewed the safety of radiation emitting telecommunications technologies, as it does new drugs or medical devices (including Radiofrequency Radiation-emitting medical devices).*
- *I was aghast to learn the FDA officially does not review the safety of radiation emitting telecommunications technologies before they are allowed on the market, while the FCC claims it relies on the safety expertise of the FDA and that it considers opinions of the FDA in setting its safety guidelines for Radiofrequency Radiation.*
- *I later learned thousands of scientific studies dating back 80+ years document risks from Radiofrequency Radiation, and that this large (and ever growing) body of research includes many detailed scientific reports about risks prepared by the U.S. government itself, such as by the Naval Medical Research Institute (1971), NASA (1972, 1981), Defense Intelligence Agency (1976), EPA (review draft 1990, suppressed), U.S. Air Force (1994), Department of the Army (1998, declassified 2006), the National Institute on Drug Abuse /NIH with the Department of Energy (2011), Department of Interior (2014) and the National Institute of Environmental Health Sciences/NIH National Toxicology Program (NTP) (2018).*

If the FDA had been doing its job, thoroughly researching the risks of these technologies, and informed the FCC as to what would be acceptable exposure limits for cell phones and wireless technologies from a biological perspective, we would be living in a different world today.

All of us would not be blanketed in harmful radiation, indoors and out, impacting our immune systems, DNA, neurological function, cognitive function, and much, much more. Fiber optic cables to the premises would be the technology of choice to access the Internet, affording advanced, far faster and more energy efficient Internet communication without any of the health risks (As described in the 2018 policy paper, "Re-Inventing Wires: The Future of Landlines and Networks").

If the FDA had done its job, I would have been informed of the risks from cell phones and wireless devices and been able to make informed choices about exposures to these technologies. I would likely not have purchased a cell phone, or at least never used it against my head, or used it frequently, or for long durations.

If the FDA had done its job, over a hundred million radiating utility meters would not have been installed across our country, severely damaging peoples' health right in their own homes. State and local governments would not have been deceived about the radiation risks to residents from these meters, nor about the alleged benefits (that they would support expansion of renewable energy technologies), nor deceived about alleged customer benefits (97% of which have never materialized).

Stimulus funding using taxpayer dollars would not have been wasted on 'smart' meters, that harm people while only serving the economic benefits of the utilities, which are incentivized to spend on capital investments to collect guaranteed rates of return from ratepayers on capital spending.

If the FDA had done its job, the media the world over would have been able to warn the public about cell phone and wireless risks, instead of parroting the 'no risk' narrative.

Because of the misperception that a thorough FDA evaluation had informed the FCC's exposure guidelines for Radiofrequency Radiation, the media has largely turned a blind eye to the cellphone and wireless risks, for decades, while exposures have impaired peoples' quality of life, job performance, ability to learn in educational settings, and driven up illnesses of many, many kinds, with most people in the dark not connecting the dots between their health challenges and the cellphone and wireless exposures.

If the FDA had done its job, health practitioners and patients would have been informed about the potential for Radiofrequency Radiation to impact drug actions, suppressing or amplifying the effects, in the over 4 billion U.S. retail prescriptions filled (2021).

If the FDA had done its job, industry representatives and their consultants would not have been able to mislead about Radiofrequency Radiation risk, as in this case, in a Verizon's consultant's report to a Manhattan Co-Op Board of Directors I advised. This is what was erroneously claimed:

"Note that both the FCC and the Food and Drug Administration (FDA) have certified that continuous human exposure at RF levels up to and including the FCC MPE [Maximum Permitted] limit is considered to present no RF health risk. Moreover, the FCC MPE limit has been designed to provide appropriate protection for humans of either sex, all ages, all sizes, and under all conditions."

Misleading about risks using the FDA's name is being done all across the country, leading local officials to make decisions that are dangerous for public health.

If the FDA had done its job, society would also not live with non-stop online communications to the degree it does today, and the health and mental health risks from online time and social media algorithms that damage brains, including children's brains, would never be occurring.

I refer you to the Harvard University report by Norm Alster at the Edmond J. Safra Center for Ethics, "How the Federal Communications Commission is Dominated by the Industries it Presumably Regulates" (2015). This report suggests the telecommunications industry is using the same playbook the tobacco industry did to downplay the risks of Radiofrequency Radiation, including:

- Obtuse refusal to examine the health evidence
- Hyper-aggressive legal action and bullying
- Stonewalling PR
- Undermining credibility of the scientists
- Cutting scientist funding
- Publishing contradictory science
- Trivializing highly credible dissenters

- Misleading about scientific consensus
- Light regulation
- Industry control of Congressional committees
- Revolving door between industry & regulator
- Enormous sums on direct lobbying & via associations
- Hard $ and soft $ contributions

Clearly, if the FDA had been doing its job, and had thoroughly evaluated the biological and health risks from the Radiofrequency Radiation emitted by cell phones and wireless equipment, most of the above would never have been able to occur, or would have been called out.

An important question the Harvard analysis probed, by way of a poll, was:

"Would consumers embrace cell phones and WiFi so enthusiastically if the wireless industry, enabled by FCC and 'Congressional errand boys', had not so consistently stonewalled on evidence and substituted legal intimidation for honest inquiry?"

This poll showed that if certain health claims about cell phone radiation were known to be true, the public's behavior would change. Informed citizens, the poll showed, would:

- Reduce wireless use
- Restore landlines
- Protect their children

It is high time for the FDA to come into integrity and conduct a thorough analysis of risks from Radiofrequency Radiation so that proper protection of human, animal and environmental health interests can take place.

- Protective, biologically-based exposure guidelines for RFR must be set.
- The pros and cons of different telecommunications technologies (fiber, wireless, cable, advanced copper, etc.) must be known so that the public, government officials and businesses can make fully informed choices;
- The FDA must conduct pre-market safety testing of wireless devices and wireless infrastructure prior to release of new equipment onto the market;
- The FDA must conduct short- and long-term post-market health monitoring of individuals living in dense wireless environments, and require towers be moved to protect public health, if necessary;
- The FDA and others must educate about health risks and how, through lifestyle changes, exposures might be reduced.
- The FDA must do everything possible to assure the American people that regulators' top priority is public health and safety and demonstrate it is not a captured agency.

Additional steps that can restore the trust that has been lost due to lack of clarity on responsibility between the FCC and FDA and failure of government to protect public health can be found in "33 Recommendations for the FCC, FDA and Congress".

Respectfully submitted in support of the *Citizen Petition and Request for Legal Compliance with the Legal Obligations of the FDA Regarding Public Exposure to Non-Ionizing Radiation from Electronic Products submitted by Americans for Responsible Technology and other Petitioners*

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