

## Submitting Comments to FCC Comment 12-353 and 13-5, Technological Transition of the Nation's Communications Infrastructure

### In this document:

1. **Two sample letters.**
2. **Info on how to submit a comment.**
3. **Important points you can make.**
4. **Background info that will give you additional things to say.**

### Comments/Replies are due April 10.

Submitting these comments is not hard to do. We provide you with sample letters. You can use these verbatim. You can add additional info, including your own experience, to the letter if you like.

## 1. Sample Letters

Here are two sample letters, and following that, some information that you can incorporate into the letter. Don't overwhelm yourself. The most important thing is that you make your concerns known.

- If you are affected by radiofrequency/wireless or dirty electricity or know people who are, then one of the most effective things you can do is state your experience.
- State whatever concerns you about this plan.

### Sample Letter #1

- "I am strongly against the current proposal. Many individuals are unable to tolerate radiofrequency or the voltage transients and harmonics (power quality issues) that would be caused by the proposed technology. The FCC has a duty to the public to protect the public health and safety from harm from radiofrequency radiation. Any projects moving telephone service from landlines to wireless technology should, at a minimum, be placed on hold until the FCC Docket (ET docket 13-84) looking at the outdated FCC RF limits reaches completion. However, since the FCC does not have the expertise to set biologically-based radiofrequency radiation safety limits, this plan should be placed on hold until the EPA can determine safe limits. Copper-line service carries its own power. Neither U-Verse, cell antennas, nor cellphones do. What of reliability during disasters? This is especially important since smart meters have increased the vulnerability of the electrical grid. Customers in remote areas will be hardest hit. Extending wireless service to them is not a good idea, not only because of the effect of wireless on them, but on wildlife as well. The U.S. Department of the Interior recently issued a letter stating that the radio-frequency emitted by cell phone towers is harming wildlife. Abandoning copper landline phones will leave many people with radiofrequency sickness, electromagnetic hypersensitivity, etc. cut off from the world. Therefore, abandoning landlines is not in compliance with the ADA (Americans with Disabilities Act), particularly the 2008 ADA Amendments, which base their disability determination on interference with bodily functions (<http://www.govtrack.us/congress/bills/110/s3406/text>). There are many many studies showing the RF radiation interfere with bodily processes, often seriously ([www.bioinitiative.org](http://www.bioinitiative.org))."  
*Then add a piece of info or your own story.*

### Sample Letter #2

- “I am strongly against the current proposal. Many individuals are unable to tolerate radiofrequency or the voltage transients and harmonics (power quality issues) that would be caused by the proposed technology. The FCC has a duty to the public to protect the public health and safety from harm from radiofrequency radiation. (H.R. Report No. 104-204, p. 94) The FCC does not possess the expertise to set biologically-based radiofrequency radiation safety limits. EPA does. Therefore, the FCC should advocate that Congress direct the EPA to establish biologically-based radiofrequency radiation safety limits and provide the budget and resources to carry out that task. There are thousands of studies listed in the Bioinitiative Report regarding the biological effects of weak electromagnetic fields. I personally know individuals who are harmed by wireless and the power quality issues that the proposal would engender. These individuals will be precluded from using the telephone if this proposal becomes a mandate throughout our country. Ensuring that people with disabilities continue to have access to evolving technologies is a core value of the Telecommunications Act. By the same token, ensuring that people with disabilities have access to *technology at all* is also a core value. The forced utilization of technology that requires a customer to accept a connection that brings radiofrequency-emitting devices into their home, or creates power quality issues such that their electrical wiring is contaminated by voltage transients and harmonics is not in line with the core values of this nation. Abandoning copper landline phones will leave many people with radiofrequency sickness, electromagnetic hypersensitivity, etc. cut off from the world. Therefore, abandoning landlines is not in compliance with the ADA (Americans with Disabilities Act), particularly the 2008 ADA Amendments, which base their disability determination on interference with bodily functions (<http://www.govtrack.us/congress/bills/110/s3406/text>). There are many many studies showing the RF radiation interfere with bodily processes, often seriously ([www.bioinitiative.org](http://www.bioinitiative.org)).” *Then add a piece of info or your own story.*

## 2. How to Submit

There are two ways to file.

**# 1 Simple Filing. Use this if you don't want to add any attachments. It really is SIMPLE! Go the link, then copy and paste one of the letters below, perhaps adding a little bit of your own commentary.**

- <http://apps.fcc.gov/ecfs/hotdocket/list>
- You have to file twice for 2 different dockets. So, write up what you have to say in a Word document, then paste it in. These are the two docket numbers:
  - **13-5**, Task Force-related ex partes (this appears first, about 7 items down)
  - **12-353**, Comment Sought on the Technological Transition of the Nations Communications Infrastructure (appears second, about 7 items below 13-5).
- Click on each number separately, and fill in your information and brief (numbered) points.
- If both dockets are not listed you may have to file using the longer directions below. You will also need to use the longer directions if you wish to submit a pdf or other attachments.
- **Be sure to hit the Confirm button after you submit.**

**Longer Directions, if you want to add attachments or your comments are more than a couple pages**

- <http://apps.fcc.gov/ecfs/upload/display?z=22crk> First fill in the box for the Proceeding Number with **12-353** . Then click on the link <Add Another Proceeding>, that you will see in blue on the

left, just below the number you just typed in. Type in **13-5**. In the “Details” section don’t check the box “Exparte Presentation.” For <Type of Filing>, “COMMENT” will be showing in the box. Change it to “REPLY” after March 31. In the File Number box type – **14-285**. Ignore the Report Number and Bureau ID Number boxes. If you have questions, email or call us. Be sure not to attach more than 10485760 Kb of information. The government website makes it very difficult to process a submission. The website may give you errors. Just hit the Back button and resubmit. It should take it eventually. This is one more way they try to keep the people from speaking out! **Be sure to hit the Confirm button after you submit.**

### 3. Here are some important points

- The FCC has a duty to the public to protect the public health and safety from harm from radiofrequency radiation. (H.R. Report No. 104-204, p. 94) FCC does not possess the expertise to set biologically-based radiofrequency radiation safety limits. EPA does. Therefore, the FCC should advocate that Congress direct the EPA to establish biologically-based radiofrequency radiation safety limits and provide the budget and resources to carry out that task. 2012 HR6358 was an excellent example of legislation to authorize the EPA to establish biologically-based radiofrequency radiation safety limits
- Until the potential technical problems are addressed such that U-Verse is safe, no customer should be forced off their copper line service.
- Copper line service carries its own power. Neither U-Verse, cell antennas, nor cellphones necessarily do. What of reliability during disasters? This is especially important since smart meters have increased the vulnerability of the electrical grid (<http://www.gettingsmarteraboutthesmartgrid.org/>, <http://electromagnetichealth.org/wp-content/uploads/2014/02/Smart-Grid-Report-3-15-13.pdf>). Major outages have increased in the last few years.
- Ensuring that people with disabilities continue to have access to evolving technologies is a core value of the Telecommunications Act.
- See also all the points on our website about [Michigan Landlines](#).

### More Important Points

Below are some points that you might want to include in your reply comment, then personalize/support them with a brief account of your own experience and your favorite references (which you can also upload for the FCC to read).

- No one should be forced to switch from the tried and true safety of landlines to a potentially hazardous technology compliant only with outdated safety limits.
  - In a recent letter, the United States Department of the Interior states that “the electromagnetic radiation standards used by the Federal Communications Commission (FCC) continue to be based on thermal heating, a criterion now nearly 30 years out of date and inapplicable today” ([http://www.ntia.doc.gov/files/ntia/us\\_doi\\_comments.pdf](http://www.ntia.doc.gov/files/ntia/us_doi_comments.pdf))

- IARC of the World Health Organization classified radiofrequency radiation as a class 2B possible carcinogen in May 2011. Experts think the classification should be changed to probable carcinogen or even carcinogen - <http://thetruthaboutsmartgrids.org/2013/12/04/rf-fields-possibly-probably-or-definitely-carcinogenic/>
- EPA classified radiofrequency radiation as a probably carcinogen in 1990
- 2012 BioInitiative Report classifies radiofrequency radiation as a carcinogen. [Here is a sample wording to use to include 2012 BioInitiative Report in your comment without uploading the whole thing: The 2012 BioInitiative Report is incorporated by reference herein in its entirety ([http://www.bioinitiative.org /](http://www.bioinitiative.org/))]
- “Public safety standards are 1,000 – 10,000 or more times higher than levels now commonly reported in mobile phone base station studies to cause bioeffects.”(<http://www.bioinitiative.org/conclusions/>) - You can find other great quotes relevant to your situation to include by visiting their conclusions section.
- The FCC has a duty to the public to protect the public health and safety from harm from radiofrequency radiation. (H.R. Report No. 104-204, p. 94)
- FCC does not possess the expertise to set biologically-based radiofrequency radiation safety limits. EPA does. Therefore, the FCC should advocate that Congress direct the EPA to establish biologically-based radiofrequency radiation safety limits and provide the budget and resources to carry out that task. 2012 HR6358 was an excellent example of legislation to authorize the EPA to establish biologically-based radiofrequency radiation safety limits
- Abandoning copper landline phones will leave many people with radiofrequency sickness, electromagnetic hypersensitivity, etc. cut off from the world. Therefore, abandoning landlines is not in compliance with the ADA (Americans with Disabilities Act), particularly the 2008 ADA Amendments, which base their disability determination on interference with bodily functions (<http://www.govtrack.us/congress/bills/110/s3406/text>). There are many many studies showing the RF radiation interfere with bodily processes, often seriously ([www.bioinitiative.org](http://www.bioinitiative.org)).
- Courts have interpreted the ADA and the 2008 ADA Amendments broadly to ensure accessibility throughout society and require broad inclusivity. (<http://www.justice.gov/osg/briefs/2003/3mer/2mer/2002-1667.mer.aa.html>, <http://disabilitylaw.blogspot.com/2012/06/d-mass-allows-ada-title-iii-challenge.html>) Thus, telecom companies cannot abandon landlines until they have a technology that provides an equal or better level of access to people with symptoms of RF sickness - estimated at 3-30% of the population and ranging from severely impaired to less severely impaired. People with RF sickness cannot safely use wireless technology or technology which exposes them to RF on wiring.
- No new source of radiation exposure should be allowed without examining the ADA compliance. Many people are now excluded from public buildings, public places, parks, highways, and limited in almost all aspects of normal daily living. Continued rollout of additional sources of RF radiation puts the FCC in direct violation of the ADA.

- If you are restricted in your activities by the presence of RF radiation, please give personal examples to add power to your input.
- Any projects moving telephone service from landlines to wireless technology should be placed on hold until the FCC Docket (ET docket 13-84) looking at the outdated FCC RF limits reaches completion.
- A NEPA evaluation and EIS are necessitated by the presence of three options which have the potential to have radically different impacts [Burkholder v. Peters, 58 F. App'x 94, 96 (6th Cir. 2003) (quoting 42 U.S.C. § 4332(2)(C)).] The EIS should include a review of the impact of all options on the environment, as well as on human health and safety. "The Report on Possible Impacts of Communication Towers on Wildlife Including Birds and Bees" commissioned on 30th August, 2010 by the Ministry of Environment and Forest, Government of India (incorporated by reference herein in its entirety [http://www.moef.nic.in/downloads/public-information/final\\_mobile\\_towers\\_report.pdf](http://www.moef.nic.in/downloads/public-information/final_mobile_towers_report.pdf)) and "Impacts of radio-frequency electromagnetic field (RF-EMF) from cell phone towers and wireless devices on biosystem and ecosystem – a review," (incorporated by reference herein in its entirety [http://www.biomedonline.com/Articles/Vol4\\_4\\_2012/Vol4\\_4\\_202-216\\_BM-8.pdf](http://www.biomedonline.com/Articles/Vol4_4_2012/Vol4_4_202-216_BM-8.pdf)) and the letter from the Department of Interior (incorporated by reference herein in its entirety [http://www.ntia.doc.gov/files/ntia/us\\_doi\\_comments.pdf](http://www.ntia.doc.gov/files/ntia/us_doi_comments.pdf)) provide enough compelling evidence of potential environmental harm at existing RF limits to necessitate an EIS evaluating the harm done by promoting additional wireless use and installation, or continuing in the status quo, compared to requiring repair of existing landline telephone infrastructure and pricing of wireless service to discourage frivolous use of wireless technology.

## 4. Background

**The wireless technology that AT&T proposes to replace many landline phones with has been classified as a class 2B possible carcinogen by the World Health Organization and a probable carcinogen by the EPA and only complies with completely outdated thermally-based "safety" limits.** It should not be forced on ANY telephone customers. Use should be discouraged, not encouraged because additional use means an increase in unavoidable radiation emissions from antenna installations, resulting in increased health risks for surrounding citizens and increased environmental damage (<http://www.youtube.com/watch?v=wARxnaxrRkk>). Thus, even this trial must have an Environmental Impact Statement done under NEPA.

AT&T says they have to transition away from copper line phones because too many people have already moved away from them. However, based on the experience of people I know, this is a problem of AT&T's own making because they have essentially neglected their copper wires so badly that the phone service has become so crummy and repairs so poor that people are forced to leave landline phones if they want decent service. Does this mean other essential services can neglect their way into forcing changes?

U-Verse is a fiberoptic system that often utilizes the copper line system to get to each home in established neighborhoods. In new suburbs, it is fiber to the home. There are substantive questions related to the safety of hybrid systems.

Engineering standards for high-speed internet services need to be developed that protect human health by minimizing exposure high frequency signals since evidence exists that exposure to both transmitted RF and RF on building wiring can cause serious human health problems ([www.electricalpollution.com](http://www.electricalpollution.com)).

Existing standards designed to protect against radio signal interference are inadequate to protect people from experiencing adverse RF health effects.

Both engineering problems that I can see would relate to the affect of "dirty" electricity or RF on wiring can have on people. In the hybrid system, high frequency signals would be put on the copper phone wire whose ground is bonded to the ground for the electrical utility system, thus the very high frequency signals could go from the phone line to the ground wire to the rest of the electrical grid and as ground currents in the surrounding area. Additionally, very high frequency transients from the signal generator for the fiber optic could get on the electrical wiring where it would be measurable in surrounding buildings, would increase the overloading of the neutral wire, and increase electrical ground currents. Both are engineering problems that should be addressed prior to rolling U-Verse out further.

U-Verse also provides a WiFi service within each home. The default setting is ON. Whether the transmitter may be turned off at all is unclear. No provider should be providing a WiFi service hub within homes, especially not in a default transmitting condition. Such transmitters expose occupants inside the home to biologically active and potentially harmful levels of radiofrequency (microwave) radiation without notification or permission. Further, they expose neighbors, passersby, and the general environment to biologically significant levels of radiation

(see [http://www.ntia.doc.gov/files/ntia/us\\_doi\\_comments.pdf](http://www.ntia.doc.gov/files/ntia/us_doi_comments.pdf) for a discussion of some of the negative environmental impacts by the Department of Interior). Therefore, no additional U-Verse installations should be made with default WiFi activated service hubs prior to a NEPA review of the environmental impact of such widespread installations of microwave transmitters. Any further installations of in home WiFi service should require notification of homeowners of the IARC and EPA carcinogen classification of RF radiation and the wide array of potentially detrimental biological effects that RF radiation exposure can have.

Until the potential technical problems are addressed such that U-Verse is safe, no customer should be forced off their copper line service.

Copper line service carries its own power. Neither U-Verse, cell antennas, nor cellphones necessarily do. What of reliability during disasters? This is especially important since smart meters have increased the vulnerability of the electrical grid (<http://www.gettingsmarteraboutthesmartgrid.org/>, <http://electromagnetichealth.org/wp-content/uploads/2014/02/Smart-Grid-Report-3-15-13.pdf>). Major outages have increased in the last few years.