

## **Synopsis of FCC Submission**

Because his full submission is a long document we present here a synopsis of major sections so that you, the reader, and examine particular sections.

Executive Summary (pages 2-3)

Table of Contents (pages 3-4)

History of Exposure Limits (pages 5-25)

This section provided an overview of the history of various industry oriented organizations which from 1974 onwards have established exposure limits. Of particular interest are the consistent concerns which document expressed even while ignoring these concerns.

IARC's Possible Carcinogen Finding (pages 25-27)

This section discussed the Cellular Telecommunications Industry Association's (CTIA's) denial/distortion of the importance of this finding.

ICNIRP "Harmonization" (pages 27-29)

The CTIA and the FCC desired to "harmonize" U.S. exposure limits, whose effect will be to increase the existing exposure limits.

Fifty-fold safety limit is specious (pages 29-30)

This section notes that the actual "safety" limit is 40% lower than the levels that may cause "irreversible injury" in rats. It compare this to other safety limits whose exposure levels are usually greater than 100 times below levels where effects have been found.

FCC's Two Cellphone Certification Processes (pages 30-42)

This discussed at some length two FCC certification processes: The exclusively used SAM process, and the never used computer simulation process. Table 1 (page 39) compares these two processes and would be sufficient for a quick understanding for the differences between processes.

Credibility of [CTIA cited] Sources, Organizations (pages 42-47)

Shows that the 12 organization listed are industry-influenced organizations with little to no medical or public health knowledge.

### Credibility of [CTIA cited] Sources, Individuals (pages 47-59)

This section lists 32 individuals, many of which are members of the listed organizations, and all which have direct conflicts-of-interests with industry. Many of these same individuals participated in writing the various exposure limit documents.

### The Stability of Brain Cancer Incidence Rates? (pages 59-62)

The CITA asserts that because 3 cited studies have not found increased brain cancer incidence rates, cellphones there is no evidence that cellphones are causing brain cancer. Why these 3 studies did not find an increase is explain and shows contrary results from multiple countries including the U.S., reported a doubling of the worst brain cancer—glioblastoma—in the previous 10 years

### Normal Operation Positions (page 62-64)

Shows the FCC's requirement that while exposure limits required for "normal operating positions" this requirement is being ignored.

### Science Studies Reporting Adverse Health Effects (pages 64-75)

The CTIA asserts that there are no studies showing adverse health effect. This section shows this is not true. It contains a partial list of the myriad studies which have reported adverse health effects.

### IARC Monograph 102 (pages 75-76)

Monograph 102 lists all of the evidence which resulted in the possible carcinogen finding. This section discussed 11 animal studies which found adverse health effects. The CITA focuses on the animal studies which did not report adverse health effects without ever stating the dictum, "absence of evidence is not evidence of absence."

### Conclusions (pages 77-79)

### Appendix, List of [IARC's] Possible Carcinogens (pages 80-87)