

Executive Summary

We document numerous errors of fact and interpretation in the CTIA Comments:

- **CHILDREN’S EXPOSURE:** Contrary to CTIA’s assertions that the current standard adequately protects children, pregnant women and other vulnerable groups, the exposure limits recommended in the past three decades have consistently singled out children’s exposure as requiring special consideration and attention.
- **“HARMONIZATION”:** The CTIA states the need to increase exposure under the rubric of international “harmonization” of the standard which would result in as much as a 3-fold increase in the maximum allowed absorption of microwave radiation.
- **FIFTY-FOLD SAFETY FACTOR:** The CTIA assertion that the current standard relies on a fifty-fold safety factor is incorrect. It is only 2.5 times higher than a potential irreversible effect.
- **STATE OF THE SCIENCE:** We counter the CTIA assertion that International Agency for Research on Cancer of the World Health Organization (IARC) declaration that cellphone and other wireless device radiation is a possible human carcinogen “does not change the state of the science.”
- **CERTIFICATION PROCESS:** We disagree with the CTIA’s assertion that there is only one FCC approved cellphone certification process. There are two FCC approved processes: Computer Simulation and SAM⁹. Computer simulation is far superior to SAM. Unfortunately the computer simulation process has never been used to certify that wireless devices meet the exposure limits although the FDA helped to develop it and currently relies on it to evaluate and approve medical devices.
- **CONFLICTS-OF-INTERESTS:** Documents that many of the organizations and individuals cited as authorities by the CTIA have direct ties to the telecommunications industry and are often funded by the industry.
- **BRAIN CANCER RATES:** We counter the CTIA assertion that brain cancer incidence rates are stable when in fact brain cancer incidence increased in 4 countries, and for 3 of these 4 countries glioblastoma has doubled, in the last decade or less.
- **EXPOSURE:** Shows how “normal operation positions” of wireless devices can result in exposures of more than 2 orders of magnitude higher than the

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⁹ Specific Anthropomorphic Mannequin

exposure limits and bone marrow in children’s skulls absorb 10-fold greater radiation than adult’s marrow.

- ADVERSE HEALTH EFFECTS: The CTIA selectively reviews the science, more often than not, incorrectly, while myriad studies published after the adoption of the current FCC exposure limits which show adverse health effects, particularly cancers contradicting CTIA’s assertions.
- ANIMAL STUDIES: CTIA assertions implying that evidence from animal studies is contradicted by listing of animal studies that found adverse effects and was used by IARC for its declaration of a “possible carcinogen.”

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