



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 16 2003

OFFICE OF
AIR AND RADIATION

C. K. Chou, Ph.D.
Co-Chairman, International Committee on Electromagnetic
Safety (ICES), Subcommittee-4
Motorola Incorporated, Florida Research Laboratory
8000 West Sunrise Boulevard
Plantation, FL 33322

Dear Dr. Chou:

This letter is in response to your proposal of a meeting with the federal Radiofrequency Interagency Work Group (RFIAWG) that would provide an opportunity for the IEEE ICES SC4 to give the Work Group an update of the revision of the C95.1-1999 standard.

We look forward to your presentation regarding the items listed in your proposed agenda, i.e., approaches of standard setting, literature review, rationale, basic restrictions and reference levels, and responses to the 14 issues raised by the RFIAWG in the June 17, 1999, letter to Richard Tell.

The RFIAWG is particularly interested in how these 14 issues are to be treated in the revision process. In addition, the RFIAWG is submitting the following additional issues for the ICES consideration and response.

Issue: Exclusion of pinna

If the pinna is to be considered an extremity and subjected to exposure limit of 20 W/Kg over 10 g of tissue, then a clear rationale for treating the pinna as an extremity should be presented. This rationale should include biological properties of the pinna that qualifies it for this exclusion. If thermal effects would be the basis for the ICES standard, then the thermophysiology of the pinna and the skin, bone and other head tissues adjacent to the pinna should be discussed for all body sizes exposed.

Issue: Rationale for relaxation of current limits

Federal agencies, as well as the general public and the public health community, are very concerned about a relaxation of exposure guidelines that may result in increased exposure in the future. A rationale should be presented for relaxation of standards. The rationale should include a clear explanation of the impact of the exposures that may

result, i.e., the description of the exposures and the effects on critical tissues and organs. An explanation should be given as to why the current standard should be relaxed. The issue of safety factors should be also be addressed as part of the rationale for relaxation of current limits.

Issue: Sensitivity of different tissues

A clear explanation on how the revision has taken into account sensitivity of different tissues to temperature. Effects of acute and chronic exposure to elevated temperature should be adequately covered. We consider it appropriate to include as a part of the revised standard a description of the risk analysis that was done.

We ask that the RFIAWG be provided with a copy of the ICES response to all of the issues raised by the RFIAWG in advance of a meeting so that the Work Group members have sufficient time to study them and prepare for the meeting. We also request that you provide any other materials that you feel would be of value to the Work Group in preparing for a meeting.

Please be aware that comments and opinions that may be expressed by the RFIAWG participants are their personal comments and opinions and have not been reviewed and/or approved by their management or their agencies.

Sincerely,



Norbert N. Hankin
Center for Science and Risk Assessment
Radiation Protection Division

Enclosure

cc: H. Bassen
C. Blackman
R. Cleveland
R. Curtis
H. Cyr
A. Desta
J. Healer
W.G. Lotz
E. Mantiply
R. McGaughy