



KAREN M. BROOKS
CITY MANAGER

May 15, 2020

Honorable Chairman Ajit Pai
Federal Communications Commission
445 12th Street, SW
Washington, District of Columbia 20554

RE: City of Coconut Creek's Comments on Proposed Rulemaking on Radio Frequency (RF) Exposure Limits under ET Docket No. 19-226

Dear Honorable Chairman Pai,

On behalf of the City of Coconut Creek, Florida, as City Manager, I would like to express our grave concerns regarding the above notice of proposed rulemaking. It is very concerning to the City that the Federal Communications Commission ("FCC") predicates many of its conclusions regarding cumulative RF exposure on conjecture alone, rather than actual controlled field studies and medical evaluations.^[2]

Furthermore, scientific advancement should not come at an unknown cost to human health. To illustrate the City's point – the FCC itself notes in the report at page 34, paragraph 69, that "the benefit of protecting humans from RF emissions causing exposures in excess of our existing limits outweighs the costs that may be associated with such evaluation." The City strongly encourages the FCC to fund (or support) evaluations and studies to learn more about the effects that cumulative RF exposure has on human health and set appropriate limits therefrom.

The City has a duty to educate the public on the FCC's safety standards, and to ensure that they are complied with. But, we are not seeing the full picture with such limited scientific information available. The City respectfully requests that the proposed rules are held in abeyance until outcomes claiming to be "highly unlikely" are definitively resolved through scientific studies and evaluations. Let us work together to ensure that these technologies do not create unintended health consequences for generations to come.

Sincerely,

KAREN M. BROOKS
City Manager

^[2] In the Matter of Targeted Changes to the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields, see pages 33-34, paragraphs 67 and 68, where the report states compounding exposures are "highly unlikely," but provide no objective data or study to support same.