



November 18, 2021

The Honorable Jessica Rosenworcel, Commissioner
Acting Chairwoman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Dear Chairwoman Rosenworcel,

We are writing to request that the FCC re-open the relevant Dockets to ensure the latest science be included in the FCC's reexamination of the adequacy of its human exposure limits and regulations for radiofrequency radiation exposures.

We urge the Commission to look at new scientific evidence published since December 4, 2019. Of 39 new genetic effect studies, 79 % (31 studies) showed effects and 21 % (8 studies) did not show significant effects. Of 33 new neurological effect studies, 85 % (28 studies) showed effects and 15 % (5 studies) did not show significant effects. Of 30 new oxidative effect studies, 93% (28 studies) showed effects and 7 % (2 studies) did not show significant effects. The preponderance of scientific research on RFR continues on an upward trend.

There is a broad consensus among those in the scientific research community who are knowledgeable on the published literature, that new, biologically-based public safety limits for chronic exposure to radiofrequency radiation (RFR) are warranted now. The available evidence for health risks due to low intensity radiofrequency radiation exposures from wireless technology applications is sufficient and compelling. Research published over the last two years has added significant additional weight to the body of evidence which indicates that FCC public safety exposure limits are grossly inadequate to protect public health given the proliferation of RFR-emitting devices now in common usage.



The evidence for health risks comes directly from hundreds of published scientific and public health studies reporting that low-intensity RFR is capable of producing health harm across very large populations of exposed people.

The BioInitiative Working Group has been gathering and evaluating hundreds of such studies since 2006, and has published two large reports detailing this evidence. The group concluded that the scientific evidence was more than sufficient in 2007, and certainly in 2012 (www.bioinitiative.org) to establish new biologically-based exposure safety standards. Further, we have submitted numerous comments to the FCC since 2013 advising that the Commission has not struck the right balance between the wireless technologies rollout and managing resulting health impacts for Americans, particularly for children. The increased risk for cancers, neurological diseases, fertility and reproduction, immune dysfunction, memory and learning impairment, and other serious medical problems associated with exposure to low-intensity RF are documented and analyzed for the Commission to review at: <https://bioinitiative.org/research/summaries/>

When the cumulative body of evidence is assessed over the last decades of research, the overall picture for studies on radiofrequency radiation effects shows clear and consistent patterns of effects on living tissues. Chronic RFR exposures at environmental levels common today can reasonably be presumed to produce health harm at and below current FCC safety limits for humans and should be substantially lowered.

Genetic effects: Effect= 67% (259 studies); No Effect= 33% (129 studies) (literature up to November 12, 2021)

Neurological effects: Effect= 74% (271 studies); No Effect= 26% (97 studies) (literature up to November 12, 2021)

Oxidative effects: Effect= 92% (258 studies); No Effect= 8% (23 studies) (literature up to November 12, 2021)



Respectfully submitted on behalf of the BioInitiative Working Group by:

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