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California Department of Health and Human Services Agency  
1660 9th St. Room 460  
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March 24, 2022

Dear Secretary of the California Health & Human Services Agency Mark Ghaly, MD, MPH,

Today, we are writing to advise you of the scientific grounds for taking action to mitigate student, teacher, and staff exposures to Wi-Fi and other non-ionizing electromagnetic fields in schools.

Wireless radio frequency (RF) electromagnetic (EMF) radiation and magnetic field/extremely low-frequency electromagnetic fields (ELF-EMF) are a rapidly increasing type of environmental exposure for children, teachers and staff in classrooms.

Current federal regulations for wireless radiation are 25 years old and based on outdated science. On August 13, 2021, the United States Court of Appeals for the District of Columbia Circuit [ruled](#) that the decision by the Federal Communications Commission (FCC) to retain its 1996 wireless radiation safety limits for human exposure to wireless radiation was “arbitrary and capricious.” Specifically, the Court pointed out that the FCC had ignored research showing damage to memory and reproduction, and ignored research finding children more vulnerable to wireless radiation. The Court [ordered](#) the FCC to “address the impacts of RF radiation on children, the health implications of long-term exposure to RF radiation, the ubiquity of wireless devices, and other technological developments that have occurred since the Commission last updated its guidelines.”

The bottom line from this landmark ruling is that no federal agency on record has done a review of the full body of research and U.S. FCC 1996 limits do not rest on a robust review of recent science.

A [recent analysis](#) by the Environmental Working Group concluded that FCC limits should be 200 to 400 times lower than the whole-body exposure limit set by the FCC in 1996, yet school districts nationwide are deploying high capacity Wi-Fi networks in school buildings,

testing out 5G networks with students and signing leases with companies that install cell towers on school property, relying on these outdated FCC limits to ensure safety.

A [substantial body of research](#) has found these types of non-ionizing EMFs associated with numerous adverse effects including [cancer](#), [DNA damage](#), [memory damage](#), [behavioral problems](#), [reproductive damage](#), [tumor promotion](#), [blood-brain barrier damage](#), [increased oxidative stress](#), [impacts to the endocrine system](#), and [brain damage](#). Many of these effects could be irreversible with grave consequences for our children's future.

By eliminating unnecessary sources of non-ionizing radiation on school property, schools can substantially mitigate the risk with lower exposures. A few specific examples of in-school EMF sources are Wi-Fi, wireless networks, chromebooks, laptops, electronics, electrical systems, cordless phones, and cell phones.

We are opposed to the field testing of 5G technology in [schools](#). The wireless industry has long pushed Wi-Fi in schools nationwide and is now proposing expanding 5G into [classrooms](#),<sup>2</sup> [arguing](#)<sup>3</sup> that “augmented reality” and “virtual reality” are “essential tools” in [classrooms](#).<sup>4</sup>

More protective regulations to mitigate, monitor, investigate and educate are moving forward in the U.S. and [internationally](#).<sup>5</sup> In addition, [PTAs](#) and [teacher unions](#) are now responding to the strong recommendations by medical organizations such as the American Academy of Pediatrics by educating and supporting policy and resolutions on minimizing cell tower, cell phone, and wireless radiation in classrooms.

The current body of peer-reviewed published research clearly shows that compliance with outdated 1996 Federal Communications Commission (FCC) regulations regarding human exposure to radio frequency does not ensure the safety of students and staff. Policy action to mitigate risk is needed today.

Both [magnetic field](#) (2002) and [radiofrequency radiation](#) (2011) were classified<sup>6,7</sup> as a Group 2B possible carcinogen by the World Health Organization International Agency for Research on Cancer (IARC). However, since these determinations years ago, the published peer-reviewed [scientific](#) evidence has significantly increased — clearly showing these types of non-ionizing electromagnetic radiation have adverse [effects](#) at emission

[levels governments](#) currently allow.<sup>8,9,10,11</sup> Current published [research](#) has documented that the [evidence](#) is robust to now determine that RF is a proven [human carcinogen](#).<sup>12,13,14</sup>

Numerous [published](#) scientific [reports recommend](#) that the public, especially children and pregnant women, [reduce](#) their [exposure](#) to [non-ionizing](#) electromagnetic [radiation](#) in order to protect their health, including radiation frequencies that range from extremely [low-frequency fields](#) to all wireless and the higher frequencies of 5G.<sup>15,16,17,18,19,20,21,22,23</sup>

Our children are at risk. Research shows that this type of radiation penetrates deeper and more intensely into [children](#) due to their thinner skulls and [unique physiology](#). Furthermore, wireless radiation has been shown to damage brain development and is associated with attention, memory, and behavioral problems.<sup>24</sup> [The American Academy of Pediatrics](#) has repeatedly written to the FCC on the need for an update to the FCC's 1996 wireless exposure regulations because children are more vulnerable to the exposure.<sup>25</sup>

Electromagnetic radiation exposure presents occupational health issues for teachers and staff, which are especially critical for those who are pregnant or have medical conditions. [Yale research](#)<sup>26</sup> found thyroid cancer to be associated with cell phone use in people with genetic susceptibility. Prenatal radio frequency radiation exposure led to higher hyperactivity, poorer memory, and altered brain function [in mice](#).<sup>27</sup> corroborating prior published [research](#) findings of altered brain development after exposure.

Kaiser Permanente researchers have published several studies where pregnant women's exposure to non-ionizing electromagnetic fields was associated with increased [miscarriage](#) as well as increased [ADHD](#), [obesity](#), and [asthma](#) in prenatally exposed children.

Due to the [scientific evidence](#) showing [adverse effects](#) from [wireless](#) and electromagnetic radiation at legally allowed levels,<sup>28,29,30,31,32</sup> we have joined with hundreds of [doctors and scientists](#) calling to [halt 5G](#) and to reduce children's overall wireless and non-ionizing electromagnetic radiation exposure.<sup>33,34</sup> We recommend practical and actionable measures to eliminate and reduce exposures in the school setting.

Safe alternative solutions exist to connect students to the Internet, bridge the digital divide and ensure equal access. Corded connections in classrooms rather than wireless

networks are safer, faster, more secure, and do not pose the serious [liability risks](#) posed by EMFs and RF radiation.

Importantly, 5G and cell antennas should not be installed on or near schools.

Many countries and schools are taking action. More than 20 countries clearly recommend that children reduce cell phone radiation exposure. Cyprus, Belgium, France, and Israel are among the countries banning and restricting Wi-Fi in classrooms, and many private schools [world-wide](#)<sup>35</sup> have started reducing EMF exposures.

[New Hampshire](#)<sup>37</sup> launched an investigation into the health effects of electromagnetic radiation and released its [final report](#) with 15 recommendations, including the recommendation that schools reduce radio frequency radiation and replace Wi-Fi with wired networks in classrooms. In 2020, the New Hampshire State Commission issued its [recommendations](#) which included replacing wireless networks with wired corded Internet connections.

In regards to ELF-EMFs, more than a dozen countries already have some level of protective policy in place with a magnetic field radiation limit for “sensitive areas” that ensures ELF-EMF levels do not exceed levels associated with cancer in research studies. Aside from the California Department of Education [regulation](#) that requires distances between new schools and the edge of a transmission line “right-of-way,” there exists little protection in the U.S. for schools, as there is no federal limit for human exposure to magnetic field electromagnetic fields.

## Recommendations

We recommend these best practices to reduce non-ionizing electromagnetic exposures in schools and colleges:

1. **Install a safe wired ethernet communication and information technology infrastructure in schools to meet educational needs.** Replacing wireless with wired ethernet and installing a corded, not cordless, telephone system will substantially reduce classroom exposures. Just like classrooms, dormitories should

- have wired, not Wi-Fi, connections and corded telephones for students in every room. Security systems, HVAC, and other building infrastructure should be wired.
2. **Purchase computers, laptops, tablets and other devices for classrooms that have the capability to be ethernet connected with wireless transmissions turned off.** In addition, invest in applications that can be pre-downloaded for classroom activities.
  3. **Measure radio frequency, magnetic field, and extremely low-frequency electromagnetic fields in and around school buildings and reduce levels to as low as possible.** Publicly post all results online.
  4. **Ensure school property is not located close to sources of non-ionizing radiation** such as 5G/cell towers, cell network antennas, or electricity substations of high-voltage power lines.
  5. **Promote technological literacy with new educational curriculum on how to reduce exposure to cell phone and other wireless radiation.** Students need to know laptops and tablets should be used on tables, not on laps. Students, teachers, and their families should be given clear information on why and how to reduce exposures to cell phone, wireless and magnetic field EMFs to protect their health.

We are aware that many schools and colleges are opting for virtual and/or hybrid classes. We recommend this as an opportunity to install wired technology while students are away from the buildings. In a world where our health is threatened by a pandemic, we must stop at nothing to mitigate any external health threats facing our youth. This means eliminating in-school sources of radio frequency radiation, providing the necessary equipment for students to connect to online school with wires/cords, and educating students on preventative measures they can take to reduce radiation themselves. Most importantly, however, this means taking steps toward a healthy school environment in which each student thrives.

Our recommendations to reduce radiation exposure during virtual and/or hybrid schooling include:

1. **Ensure that students have the hardware and software to hardwire Internet connections with ethernet** (instead of Wi-Fi or wireless hotspots) for virtual school at home.

2. **Educate students and staff on how to hook up their devices with an ethernet connection.**
3. **Require purchasing departments to order devices that are easily hardwired.**
4. **Educate students and staff on how to reduce EMF exposure** and on the importance of keeping devices off their laps and away from their bodies.

We have attached to this letter the following resources and tools you can use to address these environmental exposures in schools:

- The Collaborative for High Performance Schools (the United States' first green building rating program especially designed for K-12 schools) developed [Best Practices](#) for Low-EMF classrooms in 2014, addressing both wireless and ELF-EMF.<sup>43</sup>
- In 2017, the Maryland State Children's Environmental Health And Protection Advisory Council issued first ever [state recommendations](#) for reducing wireless exposure in schools by providing wired—rather than wireless—Internet connections.
- The New Jersey Education Association article, "[Minimize Health Risks from Wireless Devices](#)"<sup>44</sup> details several recommendations for reducing the health risks posed by wireless technology, such as "Keep devices away from the body" and "hard wire all devices, including printers, projectors and boards." Download [PDF](#).<sup>45</sup>
- "[Guidelines for Safer Use of Wireless Technology in Classrooms](#)" were developed for the New York State United Teachers, who also passed a Resolution "[Hazards of Wireless Radiation Emission](#)."<sup>46,47</sup>
- [The United Educators of San Francisco \(teacher union\) passed a resolution](#) recommending the [California Department of Public Health](#) issue [guidance](#) on how to reduce exposure to cell phone radiation be disseminated to all students and staff.<sup>50,51</sup>
- [Education modules](#) for students on cell phone radiation were developed in partnership with the Massachusetts Breast Cancer Coalition to teach high school and middle schoolers about why and how to reduce radiation from cell phones and wireless devices.<sup>52</sup>
- A [2017 study](#) found the environmental exposure to RF radiation in some schools with Wi-Fi is higher than reported levels for non-thermal biological effects and the researchers recommend schools prefer wired network connections and allow laptop, tablet and mobile phone usage only in flight/airplane mode.

- A [2019 publication](#) in the industry journal *Building and Environment* details best practices in buildings to reduce radio frequency as including wired technology instead of Wi-Fi and including corded (instead of cordless and other wireless mobile) phones.<sup>48</sup>
- Environmental Health Trust has developed a [checklist](#) of actions for schools to reduce EMF.<sup>49</sup>

### The Risk of Inaction is High

Wi-Fi, cell phones, cell towers, 5G in the classroom and cell towers on school property present serious liability issues.

- [Insurers](#) rank 5G and electromagnetic radiation as a “high” risk, comparing the issue to lead and [asbestos](#).<sup>38,39</sup> A 2019 Report by [Swiss Re Institute](#), a world leading provider of insurance,<sup>42</sup> classifies 5G mobile networks as a “high,” “off-the-leash” risk, stating, “Existing concerns regarding potential negative health effects from electromagnetic fields (EMF) are only likely to increase. An uptick in liability claims could be a potential long-term consequence” and “[a]s the biological effects of EMF in general and 5G in particular are still being debated, potential claims for health impairments may come with a long latency.”
- Due to their understanding of the magnitude of this future financial risk, most [insurance plans](#) have “electromagnetic field exclusions” applied as the [market standard](#).<sup>40</sup> [Portland Oregon Public School Insurance](#)<sup>41</sup> (Pg 30) states as an example, “Exclusions: This insurance does not apply to: Bodily injury, personal injury, advertising injury, or property damage arising directly or indirectly out of, resulting from, caused or contributed to by electromagnetic radiation, provided that such loss, cost, or expense results from or is contributed to by the hazardous properties of electromagnetic radiation.”
- U.S. mobile operators have been [unable to get insurance](#) to cover liabilities related to damages from long-term exposure to radio frequency emissions for over a decade.
- Wireless and non-ionizing electromagnetic radiation are defined as a type of “pollution” by wireless companies themselves. According to [pg. 10 of the Verizon Total Mobile Protection Plan](#), “pollution” is defined as “The discharge, dispersal, seepage, migration or escape of pollutants. Pollutants means any solid, liquid, gaseous, or thermal irritant or contaminant including smoke, vapor, soot, fumes,

acid, alkalis, chemicals, artificially produced electric fields, magnetic field, electromagnetic field, sound waves, microwaves, and all artificially produced ionizing or nonionizing radiation and/or waste.” We found similar definitions for pollution in the product protection plans for [AT&T](#), [Sprint](#), [Verizon](#), [T-Mobile](#) and [Asuria](#).

- Wireless companies [warn their shareholders](#) of this potential future risk related to radio frequency radiation exposure but they do not warn the users of these products, nor do they warn the people exposed to emissions from their products and infrastructure. These corporate investor [warnings](#) by companies such as [AT&T](#), [Verizon](#), [Vodafone](#) and [Crown Castle](#) are contained in their Annual Reports filed on Form 10-K (or Form 20-F or 40-F for foreign companies) with the Securities and Exchange Commission (SEC) and they clearly inform shareholders that companies may incur significant financial losses related to electromagnetic fields. Safety is not assured.

As an example, Crown Castle states in its [2020 Annual Report](#), “*We cannot guarantee that claims relating to radio frequency emissions will not arise in the future or that the results of such studies will not be adverse to us...If a connection between radio frequency emissions and possible negative health effects were established, our operations, costs, or revenues may be materially and adversely affected. We currently do not maintain any significant insurance with respect to these matters.*”

Leadership regarding wireless radiation is critical to supporting the serious challenges that education and health authorities are facing today.

We write to offer our expertise to support these needed safety measures. Please see the attached resources with additional documentation. We are available to meet with your leadership to present how to reduce and mitigate the risks of radiation exposure. Thank you for your consideration and action on this issue.



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