

October 27, 2023

To the Massachusetts Joint Committee on Education

Re: Testimony and Resources for S.316: An Act Relative to Best Management Practices for Wireless in Schools and Public Institutions of Higher Education.

Environmental Health Trust (EHT) is a non profit scientific think tank that promotes a healthier environment through research, education, and policy. We carry out research on environmental health hazards and also work directly with communities, health and education professionals, and policymakers to understand and mitigate these hazards.

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 student classrooms and dorms.

Wireless radio frequency (RF) electromagnetic (EMF) radiation and magnetic field/ extremely low frequency electromagnetic fields (ELF-EMF) are a relatively new and rapidly increasing environmental exposure in classrooms today. A substantial body of research has found these types of non-ionizing EMFs associated with numerous adverse effects including cancer, DNA damage, memory damage, headaches, reproductive damage, tumor promotion, blood brain barrier damage, increased oxidative stress, impacts to the endocrine system, brain damage.¹ Many of these effects could be irreversible with grave consequences for the health of staff and students.

EHT experts recently published a review paper entitled “Wireless technologies, non-ionizing electromagnetic fields and children: Identifying and reducing health risk” which concludes with key recommendations for the home and school due to the accumulated scientific evidence.

By taking simple steps to eliminate unnecessary emission sources on school property, you can substantially mitigate the risk and lower overall exposure levels. A few specific examples of in-school sources of non-ionizing electromagnetic fields are Wi-Fi networks, laptops, electronics, electrical systems, cordless phones, cell phones and cell boosters. A cell tower or cell antennas on or near campus will also elevate ambient levels in the community.

In addition, we caution against 5G devices. 5G is the latest technology and is already being field tested in schools. The wireless industry has long pushed Wi-Fi in schools nationwide and is now proposing expanding 5G into classrooms,² arguing³ that “augmented reality” and “virtual reality” are “essential tools” in classrooms.⁴

Although educational institutions often rely on the 1996 federal regulations of the Federal Communications Commission (FCC) regarding human exposure to wireless radiation, these limits do not ensure safety due to several serious deficits. For example, FCC limits are based on protecting against the heating effects of short term intense exposure but they are not designed to protect against the biological effects of long term chronic exposures.

On August 13, 2021, the United States Court of Appeals for the District of Columbia Circuit ruled in our lawsuit against the FCC that the decision by the Federal Communications Commission (FCC) not to update its 1996 safety limits for human exposure to wireless radiation (which includes cell tower and Wi-Fi emissions) was “arbitrary and capricious.” One of the most important aspects of the court decision was that the court found the FCC ignored scientific evidence on impacts from long term wireless radiation exposure. The court ordered the FCC to show that it had examined the record evidence regarding long term exposure, children’s unique vulnerability, non cancer impacts (memory and reproductive harm) and environmental impacts. So far, the FCC has not responded to the court mandate.

Further, the EHT et al. v FCC court ruling highlights how no federal health agency has reviewed the full body of current research to ensure the current human exposure limits of the FCC are adequately protective.

The peer-reviewed published research clearly shows that compliance with Federal Communications Commission (FCC) regulations regarding human exposure to radiofrequency does not ensure the safety of students and staff. More protective regulations to mitigate, monitor, investigate, and educate are moving forward in the U.S. and internationally⁵. 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.

Wireless Radio Frequency (RF) and Powerline Magnetic field Extremely low Frequency Non-ionizing Electromagnetic Radiation are Classified as Class 2 B Possible Carcinogen by the World Health Organization

Both magnetic field (2002) and radiofrequency radiation (2011) were classified^{6,7} 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.^{8,9,10,11}



Current published research has documented that the evidence is robust to now determine that RF is a proven human carcinogen.^{12,13,14}

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 the frequencies that range from extremely low frequency fields, to all wireless and the higher frequencies of 5G.^{15,16,17,18,19,20,21,22,23}

Children and Pregnant Staff 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 problems²⁴. 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.²⁵

Human brains are still developing into the 20's and thus college students are also very much at risk. Further, students are heavy users and often sleep with their phones and wireless devices directly on their bodies. They are continuously exposed yet unaware of the risks.

Electromagnetic radiation exposure presents occupational health issues for teachers and staff, especially critical for those who are pregnant or have medical conditions. Yale research²⁶ found thyroid cancer to be associated with cell phone use in people with genetic susceptibility. Prenatal radiofrequency radiation exposure led to higher hyperactivity, poorer memory, and altered brain function in mice,²⁷ 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,^{28,29,30,31,32} we have joined with hundreds of doctors and scientists³³ calling to halt 5G³⁴ and to reduce children's overall wireless and non-ionizing electromagnetic radiation exposure. 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.

International Policy Action

Many countries and schools are taking action. More than 20 countries clearly recommend that children reduce cell phone radiation. Cyprus, Belgium, France, and Israel are among the countries banning and restricting Wi-Fi in classrooms and many private schools world-wide³⁵ have started reducing EMF exposures. New Hampshire³⁷ launched an investigation into the health effects of electromagnetic radiation and released their final report with 15 recommendations including the recommendation that schools reduce radiofrequency radiation and replace Wi-Fi with wired networks in classrooms.

In regards to ELF-EMFs, over 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 protections in the USA for schools as there is no federal limit for human exposure to magnetic field electromagnetic fields.

We recommend Best Practices to Reduce EMF for schools and colleges including:

1. Install a safe wired ethernet communication and information technology infrastructure in classrooms and education buildings to meet educational needs: Numerous solutions exist to eliminate Wi-Fi/5G/4G sources and to reduce exposures to wireless emissions in classrooms.
2. Install corded telephones in all classrooms, dorms and buildings.
3. Measure radiofrequency, magnetic field and extremely low-frequency electromagnetic fields and reduce levels to as low as possible.
4. Ensure school property is not located close to 5G/cell towers, cell network antennas, or electricity substations of high-voltage power lines.
5. Dormitories should have wired ethernet ports, not Wi-Fi connections and corded telephones for students in every room. Students should be educated on how to connect their devices as part of their orientation. Note: cell phones can be ethernet connected as well and this can substantially reduce exposure.
6. Purchasing departments can request software and hardware that will eliminate and/or reduce exposures. For example, office computers should all be ethernet connected with a wired mouse, keyboard etc. Switches should be installed to turn off Wi-Fi access points. Programs should be able to work offline and sync up when connected.
7. Launch an awareness campaign about cell phone and other wireless radiation through a new educational curriculum on how to reduce EMF: Students, teachers, and their families should be



given clear information on why and how to reduce exposures to cell phone, wireless and magnetic field EMF's to protect their health.

Please see our recommendations to the U.S. Department of Education below. We ask that the Massachusetts State Legislature write a letter to federal agencies supporting these requests.

1. **Call on the Environmental Protection Agency to develop science-based safety limits for human exposures to RFR and magnetic field non ionizing EMF.** The allowable human exposure limits for RFR were adopted in 1996 and have not been properly reviewed or updated since. The EPA should develop safety limits based on a systematic review of the full body of scientific research including cancer and impacts to the brain and reproduction. The United States must also develop exposure limits on magnetic field EMF and other frequencies in the non-ionizing range used in electricity distribution, wireless power transfer and other applications. Currently there are no safety limits for school EMF exposures.
2. **Develop a national educational technology policy on Best Practices for Digital Devices in Schools that addresses the social, emotional and physical effects of screens.** In addition to students learning how to minimize the health effects of screens, school practice and curriculum should adhere to best practices developed for various age groups that minimizes health effects to students, teachers and staff.
3. **Call on the Department of Occupational Safety and Health to urgently address EMF as an environmental occupational exposure.** An evaluation of current and projected occupational exposures in educational settings is needed. Practical measures to reduce exposure are critical to supporting the health of teachers and staff.
4. **National Recommendations for No/Low EMF purchases.** Develop a list of school technology hardware and software changes that will eliminate or reduce EMF exposures in classrooms. For example, tablets and laptops should have a convenient ON/OFF hard switch for Wi-Fi and an ethernet port so using ethernet is convenient. Overhead projectors and printers and other educational technology should have Wi-Fi to OFF as the default setting.

The Risk of Inaction is High

Wi-Fi, cell phones, and 5G in the classroom as well as 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.^{38,39} A 2019 Report by Swiss Re Institute, a world leading provider of insurance,⁴² 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.⁴⁰ Portland Oregon Public School Insurance⁴¹ (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.”
- US Mobile operators have been unable to get insurance to cover liabilities related to damages from long term exposure to radiofrequency 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 radiofrequency 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, Vodaphone 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 their 2020 Annual Report, “If radio frequency emissions from wireless handsets or equipment on our communications infrastructure are demonstrated to cause negative health effects, potential future claims could adversely affect our operations, costs or revenues. The potential connection between radio frequency emissions and certain negative health effects, including some forms of cancer, has been the subject of substantial study by the scientific community in recent years. 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.”

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

- The Santa Clara County Medical Association Recommendations For Best Practices for Safe Technology in Schools published in February of 2023
- 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.⁴³
- 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. In 2022, they issued guidelines on how to reduce exposure for families.
- The New Jersey Education Association article, "Minimize Health Risks from Wireless Devices"⁴⁴ 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.⁴⁵
- "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."^{46,47}
- The United Educators of San Francisco (teacher Union) passed a resolution recommending the California Department of Public Health issued guidance on how to reduce exposure to cell phone radiation be disseminated to all students and staff.^{50,51}
- Education modules 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.⁵²
- 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, tablets, 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 radiofrequency as including wired technology instead of Wi-Fi and corded phones.⁴⁸
- Environmental Health Trust has developed a checklist of actions for schools to reduce EMF.⁴⁹

We offer our expertise to support you in making these changes. We are available to meet with your department of education and higher education boards to present how to reduce and mitigate the risks of radiation exposure.

Thank you for your consideration and action on this issue. Please see the attached resources with additional scientific documentation.

Sincerely,

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Wireless technologies, non-ionizing electromagnetic fields and children: Identifying and reducing health risks

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Children today are conceived and live in a sea of wireless radiation that did not exist when their parents were born. The launch of the digital age continues to transform the capacity to respond to emergencies and extend global communications. At the same time that this increasingly ubiquitous technology continues to alter the nature of commerce, medicine, transport and modern life overall, its varied and changing forms have not been evaluated for their biological or environmental impacts. Standards for evaluating radiation from numerous wireless devices were first set in 1996 to avoid heating tissue and remain unchanged since then in the U.S. and many other nations. A wide range of evidence indicates that there are numerous non-thermal effects from wireless radiation on reproduction, development, and chronic illness. Many widely used devices such as phones and tablets function as two-way microwave radios, sending and receiving various frequencies of information-carrying microwave radiation on multiple simultaneously operating antennas. Expert groups advising governments on this matter do not agree on the best approaches to be taken. The American Academy of Pediatrics recommends limited screen time for children under the age of two, but more than half of all toddlers regularly have contact with screens, often without parental engagement. Young children of parents who frequently use devices as a form of childcare can

experience delays in speech acquisition and bonding, while older children report feelings of disappointment due to 'technoference'—parental distraction due to technology. Children who begin using devices early in life can become socially, psychologically and physically addicted to the technology and experience withdrawal upon cessation. We review relevant experimental, epidemiological and clinical evidence on biological and other impacts of currently used wireless technology, including advice to include key questions at pediatric wellness checkups from infancy to young adulthood. We conclude that consistent with advice in pediatric radiology, an approach that recommends that microwave radiation exposures be As Low As Reasonably Achievable (ALARA) seems sensible and prudent, and that an independently-funded training, research and monitoring program should be carried out on the long term physical and psychological impacts of rapidly changing technological milieu, including ways to mitigate impacts through modifications in hardware and software. Current knowledge of electrosensitivity indicates the importance of reducing wireless exposures especially in schools and health care settings.

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Abbreviations: EMF, Electro-magnetic field; EMR, Electromagnetic Radiation; FCC, Federal Communications Commission (U.S.A.); ICNIRP, International Commission on Non-Ionizing Radiation Protection; IEEE, Institute of Electrical and Electronics Engineers; MF, Magnetic field; GSM, Global System for Mobile Communications; RFR, Radiofrequency radiation; SAR, Specific Absorption Rate (a measurement of the rate at which energy is absorbed into particular tissues, when exposed to RFR); SAM, Specific Anthropomorphic Mannequin (a physical model used to estimate SAR, based on a 220 pound male with a 12 pound head); HPG, Hypothalamic-Pituitary-Gonadal axis; HSP, Heat Shock Proteins; ORSAA, Oceania Radio Frequency Scientific Advisory Association; DECT, Digital Enhanced Cordless Telecommunications; ICBE-EMF, International Commission on the Biological Effects of Electromagnetic Fields; ELF-EMF, Extremely Low Frequency Electromagnetic Fields (0 – 3 kHz); CDMA, Code Division Multiple Access; UMTS, Universal Mobile Telecommunications System; LTE, Long Term Evolution; ROS, Reactive Oxygen Species

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Introduction. Children's exposures to wireless radiation are increasing rapidly

We live in the age of technological wonder, where the ability to respond to emergencies, engage in routine commerce, and even conduct warfare has been radically altered by wireless communications. At the same time, we are also in an age of technological imperatives; that is, the fact that something *can* technically be done has been misconstrued as an argument that this *should be done*, i.e., in favor of implementing that technology. Parents understand that—just because you *can* go skateboarding without a helmet and other protective equipment does not mean that is a *good* idea. From wireless baby monitors to the iPad potty for toddlers learning to use the toilet, Wi-Fi Barbie, tablets and cell phones, today's infants, toddlers, young children, and adolescents are surrounded by wireless technologies. None has been tested for their impacts on children. Especially when used at early stages of life these devices can interfere with social development, learning, and socialization. They also can have lifelong and potentially irreversible adverse biological effects.

"Children are not little adults and are disproportionately impacted by all environmental exposures, including cell phone radiation." American Academy of Pediatrics to the Federal Communications Commission (2013)¹

Cell phones, tablets, and laptops typically operate as two-way microwave radios sending and receiving radiofrequency radiation (RFR) to and from internal and external antennas. Unchanged since 1996, RFR exposure standards for the use and operation of cell phones and other wireless devices rest on a crude physical model using an empty plastic ball for the head into which homogenous fluid is poured; this uniform medium cannot reflect the different densities and electromagnetic properties of developing physiology, morphology and tissues at

different ages, and the greater vulnerability of infants, toddlers, and children. Health based standards have never been developed to take into account the vastly different technologies, uses and users employing devices today.

Although cellular communication systems and wireless technologies have demonstrated numerous direct benefits to society, they can also pose risks to the health and safety of the billions who are exposed to unnecessary levels of RFR throughout the life span. As demonstrated in this review, given the substantial experimental, epidemiological and clinical evidence that current levels of wireless radiation can be harmful, especially to the young, we concur with those experts who counsel that policies should be governed by the concept of ALARA—as low as reasonably achievable—while research continues to evolve.

The guiding principle of radiation safety, ALARA

means avoiding exposure to radiation that does not have a direct benefit to you, even if the dose is small.²

The guiding principle of radiation safety is "ALARA". ALARA stands for "as low as reasonably achievable". ALARA means avoiding exposure to radiation that does not have a direct benefit to you, even if the dose is small.²

For more than a decade the American Academy of Pediatrics³ and the American Academy of Child and Adolescent Psychiatry⁴ advised that children age two and under have no screen time, yet infant and toddler use of devices is skyrocketing. That advice has now been modified to allow parentally supervised video calls for ages 18 to 24 months. The Pew Research Foundation surveyed parents in 2020 and 2021 and

found that 8 out of 10 parents of a child who was age 11 or younger (81%) said their child had ever used a tablet computer in 2021 up from 68% in 2020⁵; 71% said their child had used a smartphone in 2021 (See Fig. 1). More recent numbers are sure to be higher, as the pandemic has led to increased reliance on digital

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"Children are not little adults and are disproportionately impacted by all environmental exposures, including cell phone radiation." American Academy of Pediatrics to the Federal Communications Commission (2013)¹

Children's engagement with certain types of digital devices varies widely by age

% of U.S. parents of a child age 11 or younger who say that, as far as they know, their child ever uses or interacts with a ...

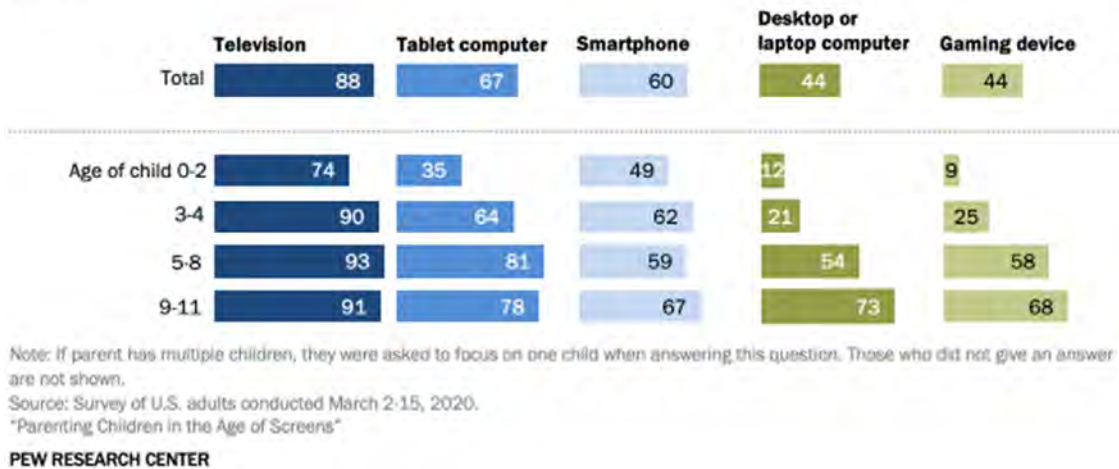


Fig. 1. Children's engagement with digital devices Survey 2020 by PEW Research Center. (For interpretation of the references to color in this figure legend, the reader is referred to the web version of this article.)

devices. Reports of serious behavioral problems including problems with self-control, socialization, language acquisition and the like have been associated with device addiction; and internet gaming disorder is on the rise in all age groups.⁶

Decades of research on RFR (including microwaves) indicate that everyday exposure to wireless devices can impact the physical, emotional and psychological health and well-being of adults and children.⁷ A growing number of independent researchers find that while regulators, such as the U.S. Federal Communications Commission (FCC) and International Commission on Non-ionizing Radiation (ICNIRP) currently consider "low-level" exposures safe; these levels do in fact place children's endocrine, reproductive, and immune systems at risk. These current regulatory limits are based on the assumption that over-heating by high power RFR is the only established health effect to be avoided. Nevertheless, numerous studies find that nonthermal levels of RFR can cause major adverse effects such as induction of reactive oxygen species (ROS), DNA damage, cardiomyopathy, carcinogenicity, sperm damage, memory damage, and neurological effects.⁸ As with many other chemical and physical hazards, there is evidence indicating that greater detrimental impacts take place when exposures occur during critical phases of growth and development, including pregnancy.⁹

Since the 1990s, member states of the European Union and the FCC have looked to the ICNIRP¹⁰ and the Institute of Electrical and Electronics Engineers (IEEE)¹¹ for risk assessments and guidance on occupational and public exposure to RFR from all sources. These groups assume that only thermal effects (excessive heating) are to be avoided. In contrast, the International Commission on Biological Effects of Electromagnetic Fields (ICBE-EMF)¹² and the Oceania Radiofrequency Scientific Assessment Association (ORSAA),^{13,14} among others, reject the assumptions on which ICNIRP relies, providing detailed grounds for their positions.¹⁵ Moreover, the former editor-in-chief of the journal *Bioelectromagnetics*¹⁶ contends that standards for evaluating wireless phones and other devices have not kept pace with developments in technology finding that nonthermal effects do occur and therefore current FCC standards do not protect public health.

Regulations on both sides of the Atlantic have in common that they are founded on risk assessments conducted in the 1980s and early 1990s by industry scientists and their affiliates in the IEEE. Despite a considerable weight of evidence indicating serious biological and environmental impacts of nonthermal levels of RFR, the FCC and the ICNIRP risk assessments of non-ionizing radiation from phones and other devices have remained unchanged for decades.

Several thousand apps have been developed for infants and toddlers to use on phones, watches and tablets with no research on their long-term physical or psychological impacts.

When phones were first brought to market, children's cell phone use was unheard of. Today children are exposed to wireless radiation from cell phones as well as numerous sources in their homes, child care settings and schools as shown in Fig. 2. Several thousand apps have been developed for infants and toddlers to use on phones, watches and tablets with no research on their long-term physical or psychological impacts. (Fig. 2)

This article assembles key scientific information regarding why and how to reduce wireless exposures to the young, including limiting prenatal and neonatal exposures. The latest scientific and clinical studies on the biological impacts of wireless radiation and

Several thousand apps have been developed for infants and toddlers to use on phones, watches and tablets with no research on their long-term physical or psychological impacts.

models of exposure are considered briefly in terms of unexplained trends in cancer, autism spectrum disorder, learning difficulties, attention deficit, behavioral and psychiatric disorders, and other increasing pediatric disorders. Finally, health professional and U.S. national policy developments

aimed at protecting children from inappropriate and harmful exposures are presented, with specific recommendations and practices for safer use of technologies.

Electromagnetic radiation and biological effects

Radio communications lie at the heart of the cell phone and wireless radiation revolution via electromagnetic "radio waves" or RFR.



Fig. 2. Sources of wireless radiofrequency radiation in the home.

Electromagnetism

The theory of electromagnetism emerged in 1865 when James Clerk Maxwell unified Ampère's work on electricity, and Faraday's and others' work on magnetism into one unified theory.^{17,18}

Simply put, an electric charge or the movement of electric charge (in electric currents through wires and devices) influences other charges or electrical currents at a distance. The influence, called a "field," results from attractive and repulsive forces between electrical charges. Positive and negative charges attract, while two charges of the same sign are forced apart. Of particular importance is how an oscillating charge creates a field that likewise oscillates, and this disturbance (called "radiation") propagates outward as a wave. Imagine a child flicking a skipping rope—the 'flick' propagates down the rope in the same fashion as the electric field propagates in the form of a wave. The theory was experimentally confirmed in 1887 by Heinrich Hertz.^{19,20}

The duality of a wave is illustrated in Fig. 3. The oscillation can be described as a sine wave that depends both on the time and place of observation. The top frame of the Figure depicts the oscillation of the wave as seen by an observer standing in one place and looking over a period of time. One can imagine standing near the ocean and staring at a buoy as it undulates up and down as waves pass below. The bottom panel looks the same but depicts how at one instant in time the waves would look at every spot. Rather like standing on the same spot near the ocean and surveying open sea and all the waves before you. The characteristic features of the wave are its amplitude, A , its wavelength, λ (the distance between two sequential peaks) and its frequency, f (the number of oscillations per second, measured as Hertz [Hz] or reciprocal seconds [s^{-1}]). The relationship between these parameters, the cyclic frequency, ω , and the wavenumber, k , are illustrated in the Figure. Most importantly the multiplication of the frequency with the wavelength equals the speed of propagation, c .

Maxwell's theory predicted that the speed of light (visible light is a form of electromagnetic radiation) would be constant at 186,000 miles per second, confirming a measurement first made on earth (rather than by astronomical estimation as done by Ole Rømer and published in 1676²¹) by Hippolyte Fizeau in 1848.²²

The frequencies of oscillation of electromagnetic waves can range from fractions of Hertz (a slow

variation in field strength taking more than a second to complete) to billions of times a second. Each frequency can be exploited technologically in different ways and this is generally represented by the Electromagnetic Spectrum.

The electromagnetic spectrum

Physicians utilize electromagnetic radiation (EMR) in many forms. High-frequency, ionizing EMR is employed for diagnosis (e.g., X-ray and CAT scan imaging) and treatment (e.g., gamma-knife and other ionizing radiation treatments for cancer; non-ionizing ultraviolet radiation provides treatment of skin conditions such as psoriasis; infrared radiation is applied in physiotherapy and intensive care), while pulsed EMR are increasingly used in orthopedics and physical therapy. The electromagnetic spectrum includes visible light that forms a sliver of the spectrum (Fig. 4), with much of the remaining parts being invisible.

In public health, strong health and safety guidelines proscribe exposing infants and young children to the sun's rays beyond limited exposures. The problematic rays are found in the sun's ultraviolet (UV) light in the UVA and UVB frequency bands. While UVB is traditionally associated with direct DNA damage that leads to melanoma or less malignant forms of skin cancer, recent evidence indicates that UVA plays a greater role than previously assumed in the onset of skin cancers and can affect the immune system and other organs as well.²³ Other parts of the spectrum, especially that of blue light at 440 nanometers are used for their biological impacts on the skin to treat hyperbilirubinemia²⁴ by stimulating the production of di-hydroxy-vitamin D in the liver in jaundiced newborns. Untreated, the syndrome can result in bilirubin concentrations that can cause acute bilirubin encephalopathy and kernicterus—a permanent disabling neurologic condition. Blue light²⁵ is also known to interfere with sleep by impeding the production of melatonin, a natural hormone released by the pineal gland that is a potent anti-oxidant and free radical scavenger produced by sleeping in darkness.

Returning to the use of the spectrum for communication, the ability to transmit a travelling electrical field across space cannot itself establish a communication channel. For that to take place, information must be encoded into that transmission. The ability to code information on EMF was what Guglielmo Marconi

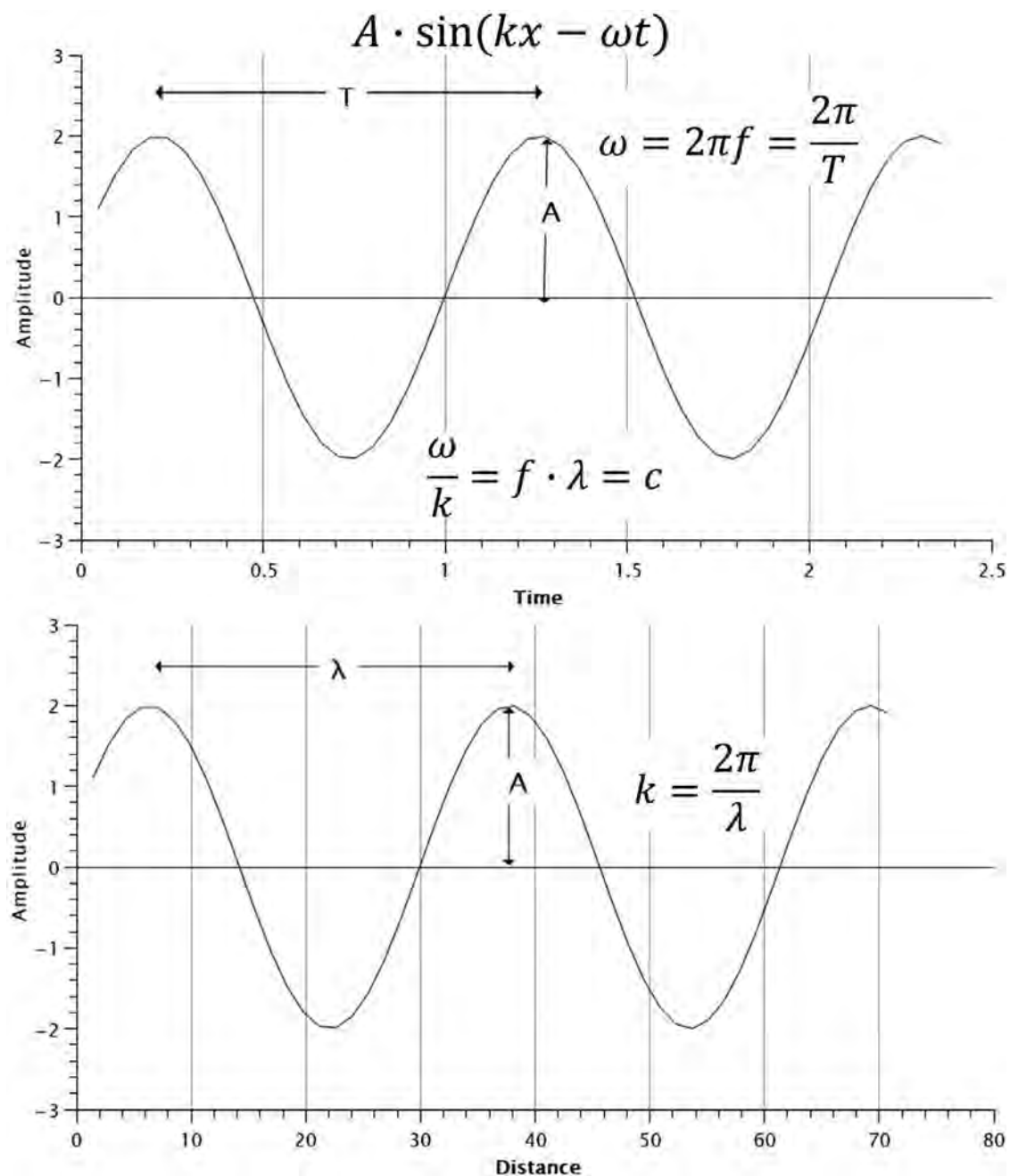


Fig. 3. Mathematical description of a continuous wave as a sine function. A is the amplitude of the oscillation, f is the frequency, T is the time period for one complete oscillation, ω is the cyclic frequency ($\omega = 2\pi f$) and k is the wave number.

demonstrated in 1897²⁶ with his first transatlantic radio transmission.

Signals

The easiest way to encode information onto EMF is to turn the transmission on and off—Morse code in

other words. Making a spark earned early Morse Code operators the moniker, “Sparky.” Dots and dashes (a “digital” mode of communication) are comparable to the ones and zeros at the root of modern computing. More information can be transmitted by a careful modulation of the amplitude of the signal in proportion to the modulation of a sound, be it someone’s

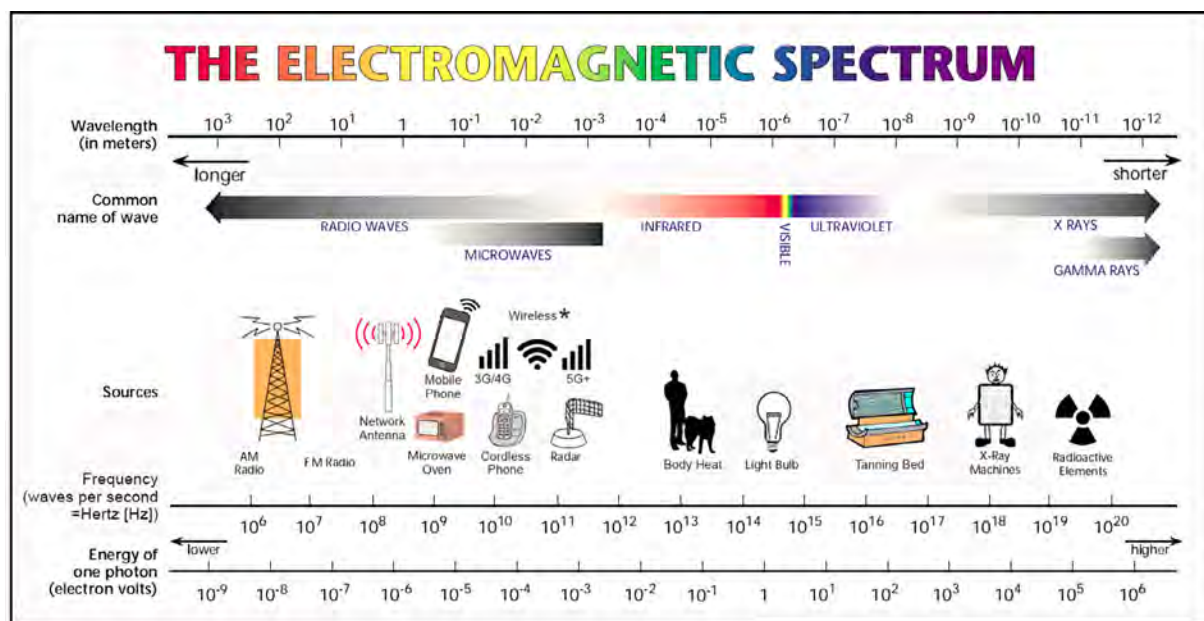


Fig. 4. Electromagnetic Spectrum

* Cellular and cordless phones; computers, laptops, tablets and peripheral equipment; antennae, Wi-Fi, access points and drones; monitors (e.g. security, medical, for babies); toys and entertainment systems; “smart” utility meters and appliances; control systems (e.g. indoor climate or lighting); “wearables”; power transfer/battery charging stations; and more. (For interpretation of the references to color in this figure legend, the reader is referred to the web version of this article.)

voice or music. This scheme, known as amplitude-modulated (AM) radio, dominated early radio and television broadcasts. However, there is a drawback with such a scheme in that only one operator can use the same radio frequency at a time. For two-way AM communication either, each side must wait for the other to stop and ‘release’ the frequency (hence the use of ‘over’ by radio operators) or there must be different carrier frequencies for each channel.

The first generation of cellular phones were little more than AM radio handsets working with 2 channel communication (by using a protocol known as Frequency Division Multiple Access²⁷ (FDMA) and transmitting to an antenna connected to the telephone network, often using relatively high powers of EMF, up to 5 Watts. Their transmissions could be famously picked up by ham radio operators, as the future King of England discovered to his chagrin, when an intimate conversation between then Prince Charles and his paramour, Mrs. Camilla Parker-Bowles was recorded by a scanner enthusiast.²⁸ Continuous analogue signals dominated telephone signals via copper wires that knitted together cities and countries, radio and television broadcasts right up until the early 1990s.

To overcome problems of limited exchange, and avoid interference and the embarrassment of royals,

digital forms of transmission were introduced. The simplest form of digitization is to modulate a carrier signal, transmitting at a set frequency by multiplying it by zero or one. This is illustrated in Fig. 5.

The first panel in the Figure shows the base sinusoidal signal and is known as the “carrier frequency”. The second panel is a digitization that turns on or off the signal. The bottom panel is the result of multiplying the two together, resulting in bursts - pulses- of transmission. A receiver tuned to the carrier frequency will translate the red envelope into ones and zeros, resulting in a digital series and information.

The increase in exposure to electromagnetic radiation

The quantity of data transmitted wirelessly and its associated radiation have increased many orders of magnitude since the inception of TV and radio programming. Rather than weekly anticipation of seeing a star on the Ed Sullivan Show or the next stage of a sitcom, we can now enjoy instant gratification with binge-watching, and endless offerings on many platforms, with important environmental implications,²⁹ including significantly increased energy and greenhouse gas emissions.

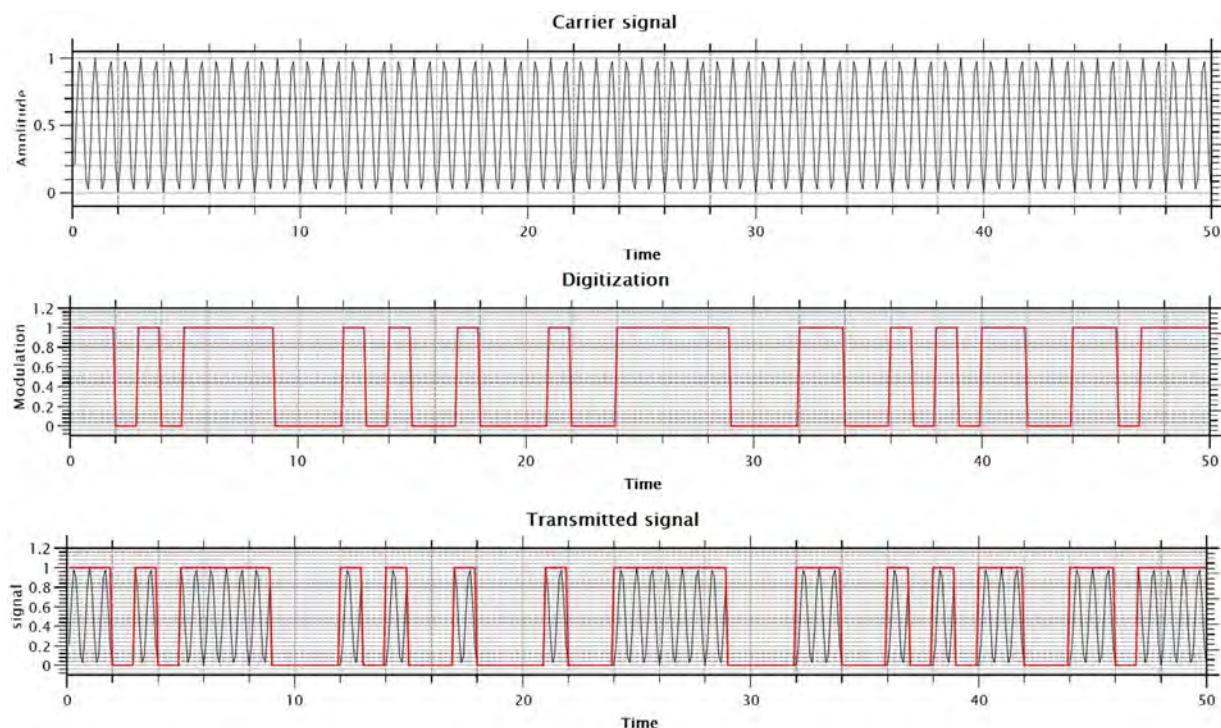


Fig. 5. A simple illustration of how a continuous carrier wave can be transformed into a pulsed signal for digital transmission. (For interpretation of the references to color in this figure legend, the reader is referred to the web version of this article.)

Since the inception of the mobile telephone age (the first commercial cellphone hit the marketplace in 1983³⁰) 40 years ago there have been 5 generations of technological advances (see Table 1) culminating in the last 5th Generation (5G) Mobile networks. Each generation has led to consequent increases in exposure to EMR.³¹ One often trumpeted claim is that the latest 5G networks will in fact be greener and reduce exposure levels. However, in discussing the energy implications of 5G rollouts, López-Pérez et al. noted in a recent survey that a 5G network may consume over 140% more energy than an equivalent 4G network.³² Additionally, there is no corroborated evidence that 5G networks will reduce exposures. There are number of studies indicating the opposite will be true^{33–36} Some industry experts report that ambient environmental exposures from near antenna installations from 5G and the densification of new wireless infrastructure can exceed those of current 3 and 4G

Some industry experts report that ambient environmental exposures near antenna installations from 5G and the densification of new wireless infrastructure can exceed those of current 3 and 4G networks up to 46 times.

networks up to 46 times.^{33,37} 5G networks have multiple beam-forming antennas, located about every 100 m.³² The public health and environmental impacts of 5G remain untested.

Part of the reason for this increase in exposure with 5G is due to the fact that as higher frequencies are used atmospheric absorption and scattering increases. Because 5G frequencies operate along the millimeter wavelengths and signals cannot travel as far as previous systems, they are more prone to disruption from objects that interfere, such as walls and other barriers. Therefore, to maintain the same signal strength more base stations are required, a process known as “densification.” Some estimates put the number of additional 5G base stations required for coverage in an urban environment to a 100-fold increase compared to an equivalent 4G network.³⁴ More base stations translate to more radiation. Another reason that greater exposures can occur is a

TABLE 1. Common cellular technologies and their respective frequency bands in the MHz (106 Hz) and GHz (109 Hz) ranges.³⁰

Cellular technology	MHz frequencies	GHz frequencies
GMS (2G)	380 – 900	1.8 – 1.9
CDMA (2G & 3G)	400 – 900	1.8 – 2.5
UMTS (3G)	699 – 900	1.7 – 2.69
LTE (4G)	400 – 900	1.9 – 5.925
5G NR (5G) FR1	600 – 960	1.5 – 6.7
Bluetooth		2.4
Wi-Fi		2.45, 5 and 6
5G NR (5G) FR2	— — —	24.25 – 71.0

The acronyms stand for Global System for Mobile communications (GSM), Code Division Multiple Access (CDMA), Universal Mobile Telecommunications System (UMTS), Long Term Evolution (LTE) and 5th Generation New Radio Frequency Range (5G NR FR). Currently 5G NR FR1 is being nationally deployed, with limited applications of 5G NR FR2 being deployed in some major cities.

result of the fact that the 5G standard relies on a new technological advance termed Multiple Input Multiple Output (MIMO) antennas. The number of users that can connect to a single base station increases by sharing out the frequency band to many more frequency channels (hence the requirement for higher frequencies) and by dividing the time each individual channel utilizes the same frequency band. In contrast to 2G to 4G standards, this division of frequency bands in 5G is multiplied by using beam-forming antennas. By using many small antennas and by closely timing individual transmissions on the same frequency, it is possible to form the signal into a tightly confined spatial beam from the base station directly to the user's 5G phone, 5G tablet or 5G computer. As long as 2 users are not standing together, they can both use the same signal frequency and not interfere with each other's transmission. These are known as "phased array antennas" and will form the heart of multiple beam-forming antenna and the need for MIMO in the 5G standard.³³ The electromagnetic frequencies utilized for wireless and cellular communications, from 1G up to 5G occupy the Megahertz (MHz) and Gigahertz (GHz) frequency ranges as depicted in Table 1.

How is EMF exposure quantified?

The metric used for measuring personal exposure from cell phones is called SAR (Specific Absorption Rate). It is a gauge of the rate of absorption of electromagnetic energy by the flesh of the user. Properly defined it is the rate of absorption of energy from a cell phone or other wireless device,

measured in Watts per Kilogram (W/kg) averaged over a time period of 6 or 30 minutes distributed into a 1 g or 10 g volume within the plastic phantom 12-pound head of a large adult male filled with homogenous fluid or his 220-pound plastic body phantom. A local SAR of 1.6 W/kg is allowed for head and torso, and 4.0 W/kg is permitted for extremities which include the ear (the pinna).

Using a computer-controlled probe that dips into the fluid-filled phantom head (see Fig. 6), the electromagnetic field strength is measured at various points inside the model of 12-pound head of a large adult male. The SAR is then calculated by the equation,

$$SAR = \frac{\sigma |E|^2}{\rho} \quad (1)$$

where σ is conductivity of the saline solution at the frequency of interest, E is the electric field strength and ρ is the density of the media. The protocol of measurement is dictated by the IEEE standard C95.1-2019.³⁸ The human phantom is known as the Specific Anthropomorphic Mannequin (SAM) and is standardized by the IEEE.³⁹ The SAR rating has been criticized as under-estimating absorption for smaller persons and for children by a number of authors⁴⁰ because the dimensions of the SAM are based on a model of the 90th percentile of 1989 United States military recruits.^{41,42,38} The homogenized saline liquid used to electrically mimic flesh cannot account for the varied and widely differing conductivities and densities of different tissues of different ages.⁴³ Underlying this model for estimating exposure is the assumption that the only harm that can be caused by an electromagnetic wave is heating of brain or body. In summary, if exposure heating results in a rise in core body temperature of less than 1 °C, then it is considered not hazardous. Criticisms of the SAR are further discussed in Section 7 on the need to update regulatory limits.

A further metric is the Ambient Power Density (PD), measured in Watts per square meter or milliwatts per square centimeter. The ambient PD metric measures the flow of electromagnetic energy per square meter from a distant source, such as a cellphone base station. In the US the safety limit for general public exposure to sources such as base stations, is set at 10 W/m² (sometimes quoted equivalently as mW/cm²).

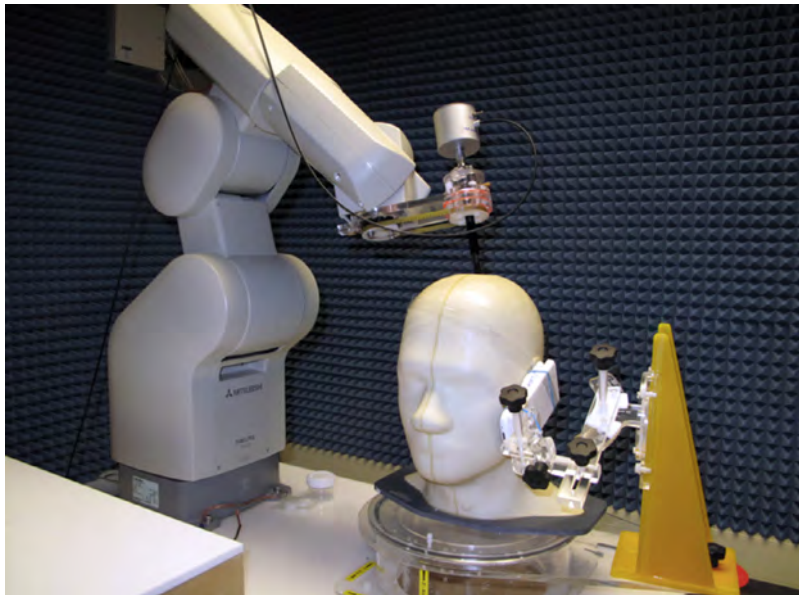


Fig. 6. Cell phone SAR RF test system using Specific Anthropomorphic Mannequin Model.

The origins of the ambient PD and the SAR regulations can be traced to the late 1950s when the U.S. Army and Navy became worried over potential harm to radar operators^{44,45} from heating by carrying out studies on a handful of dogs, monkeys and rats. They had noted eye damage and burns from over exposure and the standard for PD was set at 10 W/m.^{2,44,46} This became the established paradigm with the issuance of the first American standard in 1966 by the American Standard Association and then by the Institute of Electrical and Electronics Engineers (IEEE) for exposure to RFR and has remained ever since. Further research, including animal behavioral studies when exposed to EMF to a level that did not cause internal heating (of more than 1 °C) were used to confirm this initial assumption.⁴² In 1996 the US Federal Communications Commission (FCC) set current guidelines for the allowable RFR exposure of the general public to RFR ranging from 300 kHz to 100 GHz (3G up to 5G and

above).⁴⁷ based on a 1986 Report of the National Council on Radiation Protection & Measurements (NCRP) as well as the Institute of Electrical and Electronics Engineers (IEEE) C95.1-1991 standard.

In 2021, the U.S. Court of Appeals for the District of Columbia Circuit issued its judgment in Environmental Health Trust et al v. FCC, finding that the agency had failed to provide a rational record of review of all submitted science and specifically had not shown evidence of examination of studies provided to the agency on the greater vulnerability of children, the impacts of long term exposures, environmental impacts or the failure to update radiation test procedures for cell phones and other wireless devices which have not changed in more than 27 years.

Internationally, many national governments either take their cue for exposure levels from the FCC or from the International Commission for Non-Ionizing Radiation Protection (ICNIRP).¹⁰

A comparison of the allowed PD limits amongst countries is given in Fig. 7.

ICNIRP grew out of a working committee of the International Commission for Radiation Protection, a non-governmental organization representing professionals and bodies involved in radiation industries.⁴⁸

Numerous publications have criticized ICNIRP as a close-knit invitation-only group that downplays and misrepresents research⁴⁹ indicating biological effects at nonthermal levels and

Radio Frequency Exposure Limits for the General Public, Schools, Homes & Playgrounds For Cell Towers & Wireless Networks.

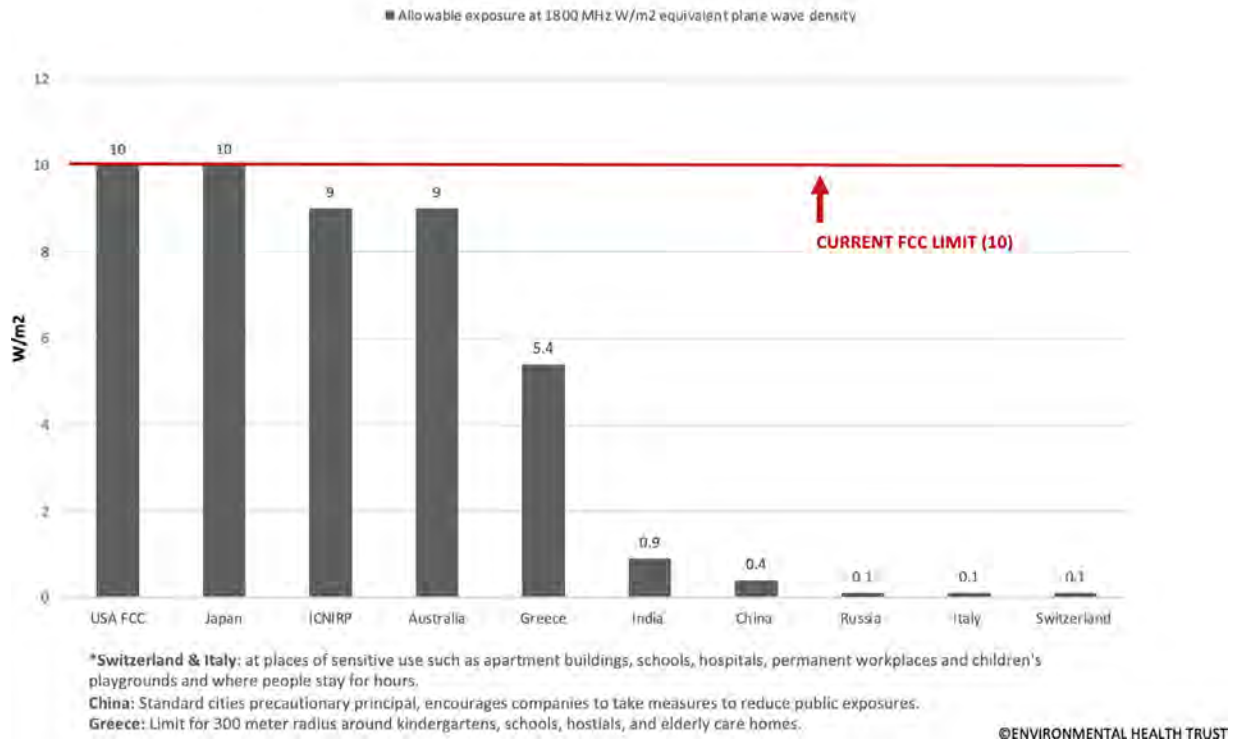


Fig. 7. Country variations for radiofrequency radiation exposure limits.

TABLE 2. ICNIRP and FCC SAR Limits in the U.S. and other countries

SAR Limits for Cell Phones and Wireless Devices	Whole -body average SAR (W/kg)	Head and Trunk * Localized SAR (W/kg)	Limbs and Extremities** Localized SAR (W/kg)	Examples of countries that adapted limits for cell phone and wireless device premarket tests
ICNIRP 100 kHz to 6 GHz All SAR limits averaged over 6 minutes. Local SAR averaged over 10 g of tissue.	0.4 W/kg	Occupational 10 W/kg averaged over 10 grams tissue	20 W/kg averaged over 10 grams tissue	Europe, Mexico, China, Greenland, Canada (for over 6 GHz), most countries in South America except Bolivia, most countries in Africa
	0.08 W/kg	General Public 2 W/kg averaged over 10 grams tissue cube	4 W/kg averaged over 10 grams tissue cube	
ICNIRP (2020) >6-300 GHz *6 minute averaging ICNIRP states, "Local Sab is to be averaged over a square 4-cm ² surface area of the body. Above 30 GHz, an additional constraint is imposed, such that exposure averaged over a square 1-cm ² surface area of the body is restricted to two times that of the 4-cm ² restriction."	0.4 W/kg	Occupational Local Sab 100 mW/cm ²		Australia
	0.08 W/kg	General public Local Sab 20 mW/cm ²		
FCC Occupational, averaging time is 6 minutes. General public averaging time ranges from 6 minutes to 30 minutes.	0.4 W/kg	Occupational 8 W/kg averaged over 1 gram of tissue cube	20 W/kg averaged over 10 grams tissue cube	United States, India, Panama, Korea, Vietnam, Canada (for under 6 GHz), Iran, Republic of Bolivia, Cuba
	0.08 W/kg	General Public 1.6 W/kg averaged over 1 gram tissue cube	4 W/kg averaged over 10 grams tissue cube	

*ICNIRP's Head and Trunk tissues have both Type 1 and Type 2. ICNIRP defines Type 1 as all tissues in the upper arm, forearm, hand, thigh, leg, foot, pinna (visible portion of the outer ear) and the cornea, anterior chamber and iris of the eye, epidermal, dermal, fat, muscle, and bone tissue. ICNIRP defines Type 2 tissues: all tissues in the head, eye, abdomen, back, thorax, and pelvis, excluding those defined as Type-1 tissue. *Limbs do not contain any Type-2 tissue.*

**FCC defines extremities as hands, wrists, feet, ankles, pinna/ ear.

instead self-references its own commissioners, many of whom have a history of conflicts of interest.^{50,51} ICNIRP and FCC limits for SAR are summarized in Table 2.

Despite innumerable studies demonstrating nonthermal biological effects of RFR, discussed below, ICNIRP and IEEE do not recognize non-thermal impacts as sufficiently “established” to be relevant to exposure limits.^{7,8,31} Numerous scientific expert groups^{7,29,52} such as ICBE-EMF and ORSAA emphatically do not agree with this view. Yet, the FCC reaffirmed their guidelines in 2019, by the expedient of simply reaffirming the existing 1996 standard.^{53,54}

In 1996 the US Federal Communications Commission (FCC) set current guidelines for the allowable RFR exposure of the general public to RFR ranging from 300 kHz to 100 GHz (3G up to 5G and above).⁴⁷ This led to legal action against the FCC because more than 11,000 pages of published scientific studies and expert recommendations had been submitted to the FCC regarding the need to strengthen its RF exposure guidelines.⁵⁵ The FCC failed to provide a rational record of review of submitted science, and specifically did not take into account evidence on the greater vulnerability of children or environmental impacts. Human exposure limits and radiation test procedures for cell phones and other wireless devices have not changed in more than 27 years.

Public exposure limits for radiofrequency radiation from cellphone towers in Italy, Switzerland and Russia are 100 times lower than those of the U.S., last set in 1996.

The World Health Organization (WHO) maintains a dedicated EMF project⁵⁶ which collates national government regulations⁵⁷ and offers advice to national government agencies. However, the WHO EMF Project has not performed health risk assessment of

Public exposure limits for radiofrequency radiation from cellphone towers in Italy, Switzerland and Russia are 100 times lower than those of the U.S., last set in 1996.

EMF project. IARC classified RFR as a class 2B possible carcinogen in 2011.⁶¹ Within the past few years, the IARC advisory group has recommended a re-evaluation of the body of evidence on cell phone risks to human health, in light of mounting evidence of adverse impacts discussed here.

Since 1996, measurement of radiation permitted from any particular cell phone is made by testing temperature changes inside a plastic phantom 12-pound head of SAM (Specific Anthropomorphic Mannequin), filled with homogenous saline liquid to mimic the human brain with its diverse tissues and densities, making a 6 to 30 minute phone call, with a spacer between the head and the tested phone to allow for the ear/pinna.

radiofrequency electromagnetic fields since 1993⁵⁸ and several have questioned its independence as well as its role in the global harmonization of EMF standards.^{59,60} The World Health Organization International Agency for Research on Cancer (IARC) constitutes a separate entity from the WHO

Since 1996, measurement of radiation permitted from any particular cell phone is made by testing temperature changes inside a plastic phantom 12-pound head of SAM (Specific Anthropomorphic Mannequin), filled with homogenous saline liquid to mimic the human brain with its diverse tissues and densities, making a 6 to 30 minute phone call, with a spacer between the head and the tested phone to allow for the ear/pinna.

Physical mechanisms of the interaction of RFR and tissues

New 5G networks are using the frequencies of previous generations, but they can in addition employ higher submillimeter and millimeter wave frequencies. The higher the frequency, the less the radiation penetrates the body, but less penetration does not mean little or no biological impact. To the contrary, UVA and UVB are entirely absorbed in the skin, and can cause important immunological effects throughout the body including on the production of vitamin D. Indeed, immune effects of UV skin exposure can have consequences for the liver, kidney and other major organs, just as do the lower MHz and GHz frequencies that can penetrate deeper into the

body. Importantly, man-made RFR used in wireless and medical devices can be modulated, polarized and pulsed, which greatly influences and can alter their ultimate impacts.^{62,63} Electroceuticals constitute an expanding field of clinical applications involving a range of medical devices, from pain control in orthopedics to cancer treatment, biofeedback, and the use of low-strength pulsed electromagnetic fields.⁶⁴ As with pharmaceuticals, any agent that promotes healing may also promote illness. It is therefore pertinent to explore potential mechanisms of interaction between tissues and electromagnetic waves.

An important division in the spectrum happens at a frequency of approximately 10^{15} Hz (wavelength 10^{-8} m). While Maxwell's theory, as described above, considers light as classical waves, modern quantum theory embraces a dualism in considering light as both a particle and concurrently as a wave.⁶⁵ One can consider an oscillating packet of waves confined spatially and moving as one through space. This is known as a photon and the energy it contains is proportional to the frequency of its oscillation. As the frequency is reduced and wavelengths get macroscopically longer (the wavelength of visible light is measured in hundreds of nanometers, whereas of radio waves in the MHz range the wavelengths are measured in hundreds of meters) the quantum description of light is indistinguishable for the classical theory of Maxwell.

The energy inherent in a photon of light at frequencies of UV and above is enough to cause the ionization of biological molecules. That means that the absorption of the photon by the molecule can result in the breaking of chemical bonds, leading to the destruction of the molecule. Specifically for DNA such an occurrence can lead to the promotion of cancers. At frequencies of radio waves direct ionization of DNA or other molecules cannot happen.

Physical mechanisms of the interaction of RFR and tissues

At the submicroscopic level molecules can be regarded as collections of potentially charged atoms held together by chemical bonds as they share electrons. RFR also affects atoms that tend to be charged; either positively charged "cations" (sodium Na^+ or calcium Ca^{2+} for example) or negatively charged "anions" (chloride Cl^-). Consequently, bonds will react to an external electromagnetic field, even if its

frequency is not high enough to lead to direct ionization. One can view such a perturbation as gently "nudging" ions. Under certain conditions bonds can change and form new chemicals. Indeed, microwaves are used commercially to speed up and alter products of chemical reactions using "microwave catalysis".⁶⁶ Dysfunctional chemical reactions can lie at the root of many distinct forms of ill health for living organisms.

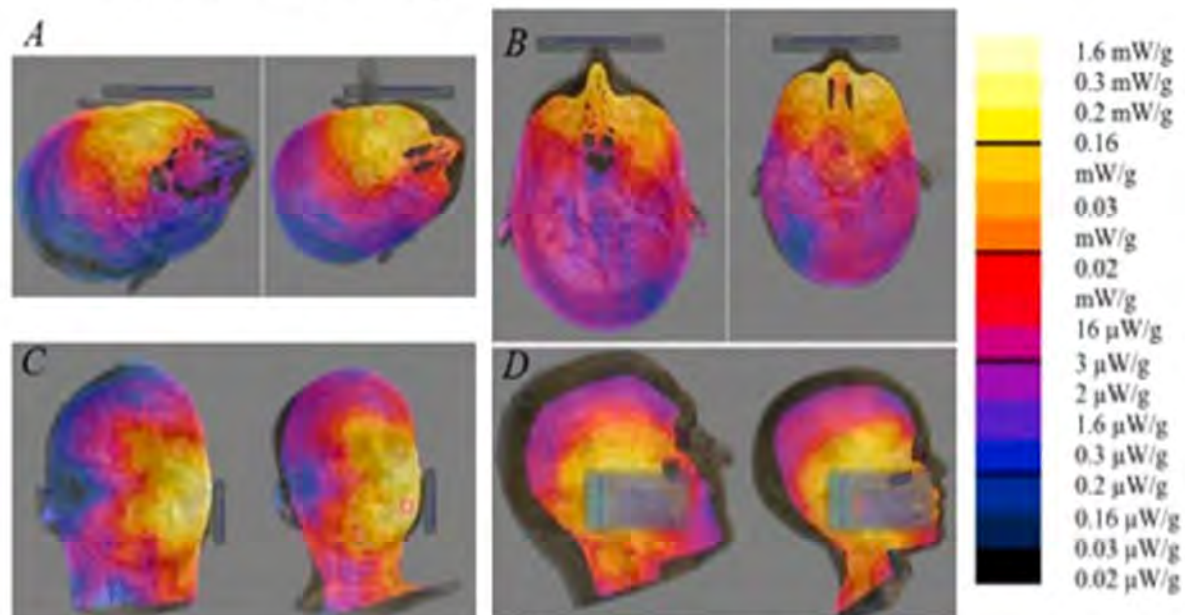
Biological pathways for non-ionizing effects

There are several pathways^{67–71} that may be involved in biological effects of RFR, including the induction of ROS leading to oxidative stress, activation of the ERK1/2 signaling pathway, and induction of heat shock proteins. One of the more accepted pathways to damage is the perturbation of Voltage Controlled Calcium Gates (VCCG) by pulsed EMF.⁷² VCCGs are an integral part of cell membranes that are responsible for the transport of Calcium ions across the cellular membrane for signaling and regulation of the cellular homeostasis. In 2000 Panagopoulos et al. concluded that the ELF EMF components of wireless communication signals are a critical factor in understanding how exposures can lead to pathology.^{72,73} Repeated irregular gating of electro-sensitive ion channels disrupts the cellular electrochemical balance and homeostasis leading to the overproduction of reactive oxygen species. The cascading effects of repeated exposures can lead to numerous biological endpoints including the weakening of cell membranes.

Disturbance in ROS homeostasis leads to a pathological state⁷⁴ termed "oxidative stress", which plays an essential role in regulation of cancer progression. ROS are understood to regulate every step of tumorigenesis and have been found to be upregulated in tumors; this can lead to aberrant signaling. In addition to cancer, oxidative stress plays a role⁷⁵ in the development of many other chronic diseases, including diabetes and neurodegenerative syndromes. Reviews of animal and cell studies consistently find even very low non-ionizing EMF exposures are associated with increased oxidative stress. Children whose immune systems are still developing are more vulnerable to these ROS effects.^{76,77} In 2019 Lai found strong indications that exposure to static and extremely low frequency electromagnetic fields also affects oxidative status in cell cultures and experimental animals.^{67–72}

Absorption of wireless radiation in the child versus adult brain and eye from cell phone conversation or virtual reality

(2018) Fernandez C et al. Environmental Research. June 5, 2018



SAR in cross-sectional views of child and adult male heads, with phone in talk and in virtual reality positions. A Axial slices (top view) of Thelonious (6 y) and Duke (34 y), with cell phone in cheek position, intersecting the eyes; **B** Axial slices (top view) of Thelonious (6 y) and Duke (34 y), with cell phone in virtual reality position, intersecting the eyes; **C** Quasi-coronal slices (frontal view) of Thelonious (6 y) and Duke (34 y) with cell phone in the cheek position, through the ear; **D** Parasagittal slices (side view) of Thelonious (6 y) and Duke (34 y), with cell phone in virtual reality position, intersecting the eye. The scale is 50 dB with 0 dB=1.6 mW/g.

Fig. 8. Absorption of wireless radiation in child vs adult brain and eye from cell phone or Virtual Reality.⁷⁰ (For interpretation of the references to color in this figure legend, the reader is referred to the web version of this article.)

Children's unique vulnerability to wireless radiation

Children are more vulnerable to wireless radiation,^{78–81} just as they are to other environmental pollutants⁹ and medicines. Present and future generations will have many more hours of cumulative lifetime exposure to RFR, because exposures begin prenatally and continue throughout early and later life.

Children have a unique physiology, that results in proportionately greater RFR absorption compared with adults.⁴ Children have smaller heads, resulting in shorter distances for RFR to travel to reach critical brain regions, and

their brains contain more fluid that can absorb relatively more energy from radiofrequency radiation sources. Fig. 8⁷⁰ shows that simulations of exposure from cell phone use have determined that children absorb up to 2-fold greater RFR in the pediatric cerebellum,

10-fold greater in the bone marrow of the skull and up to 30-fold greater in the hippocampus.⁸² Children's eyes can absorb 2 to almost 5-fold higher doses.

Children absorb proportionally more RFR than adults; about 2-fold greater in the pediatric cerebellum, ten-fold greater in the bone marrow of the skull and up to 30-fold greater in the hippocampus. Children's eyes can absorb 2- to almost 5-fold higher doses than adults.

Children's brain and body tissues have a higher dielectric constant, a measurement of the ease with which electromagnetic fields can move through different media. Peyman⁸³ documented how the young brain has a higher dielectric constant due to the higher water content and less developed myelin sheath. Bony tissues also change over time depending on the degree of mineralization of the bone matrix. The largest age-dependent variation in dielectric properties is observed in bone because as an animal grows, the high water content of red marrow is transformed to the high fat content of yellow marrow.

Every tissue in the body has unique dielectric properties. For example, the distinctive dielectric properties of normal and cancerous breast are being employed to enhance detection of abnormal cells⁸⁴ and to devise EMR-based treatments for the disease.⁸⁵

Pregnancy, infancy and childhood are periods of critical susceptibility, especially for the brain, which is developing rapidly.⁸⁶ Children have a faster rate of neuronal cell growth and the fatty protective sheath of myelin is not fully formed until the mid-20s.⁸⁷ Even very low levels of an environmental exposure early in development can have lifelong implications for neurodevelopment. Stem cells⁸⁸ are more active in children and have been found to be more sensitive to wireless frequencies than differentiated cells.⁸⁸

Cell phones and wireless devices have premarket RF emission tests using the large adult SAM model, with an empty twelve pound head into which homogenous fluid is poured. Devices are not tested using a child's smaller head and body, nor with models of pregnancy.⁴² Devices are also tested at a distance from the body, without direct contact between the antenna and the body or skull. This is why most smartphones, Wi-Fi devices and other wireless electronics have instructions, deeply buried in user manuals, which advise that devices be kept at a distance from the body.

Fig. 9⁷⁷ shows the radiation pattern simulated from a Wi-Fi tablet into the head of a 6 year old.

Reproduction and pregnancy

Reproductive capacity

Several, but not all reviews⁸⁹ of the effects of EMFs on male and female reproductive function have identified numerous serious effects that occur at levels of

RFR that do not heat tissues. Gye and Park⁹⁰ and Jangid et al.⁹¹ present a number of *in vivo* and *in vitro* experimental studies demonstrating that non-ionizing nonthermal EMF exposure can alter cellular homeostasis, endocrine function, reproductive function, and fetal development. Impacts on both male and female reproductive parameters have been reported, including: male germ cell death, the estrous cycle, reproductive endocrine hormones, reproductive organ weights, sperm motility, early embryonic development, and pregnancy success.

Mechanisms that appear to be involved at the cellular level include increases in free radicals and calcium ions [Ca^{2+}] related to effects of EMFs, which lead to cell growth inhibition, protein misfolding and DNA breaks.

Reproductive parameters reported to be affected by EMF include male germ cell damage and death. Females may experience impacts on the estrous cycle affecting ovarian follicles, reproductive endocrine hormones and reproductive organ weights. Effects on reproduction include impairments of early embryonic development, fertilization, miscarriage and a variety of pregnancy-related outcomes. As with other endpoints, experimental effects on reproductive function differ according to frequency, polarity, wave-form, strength (energy), and duration of exposure.

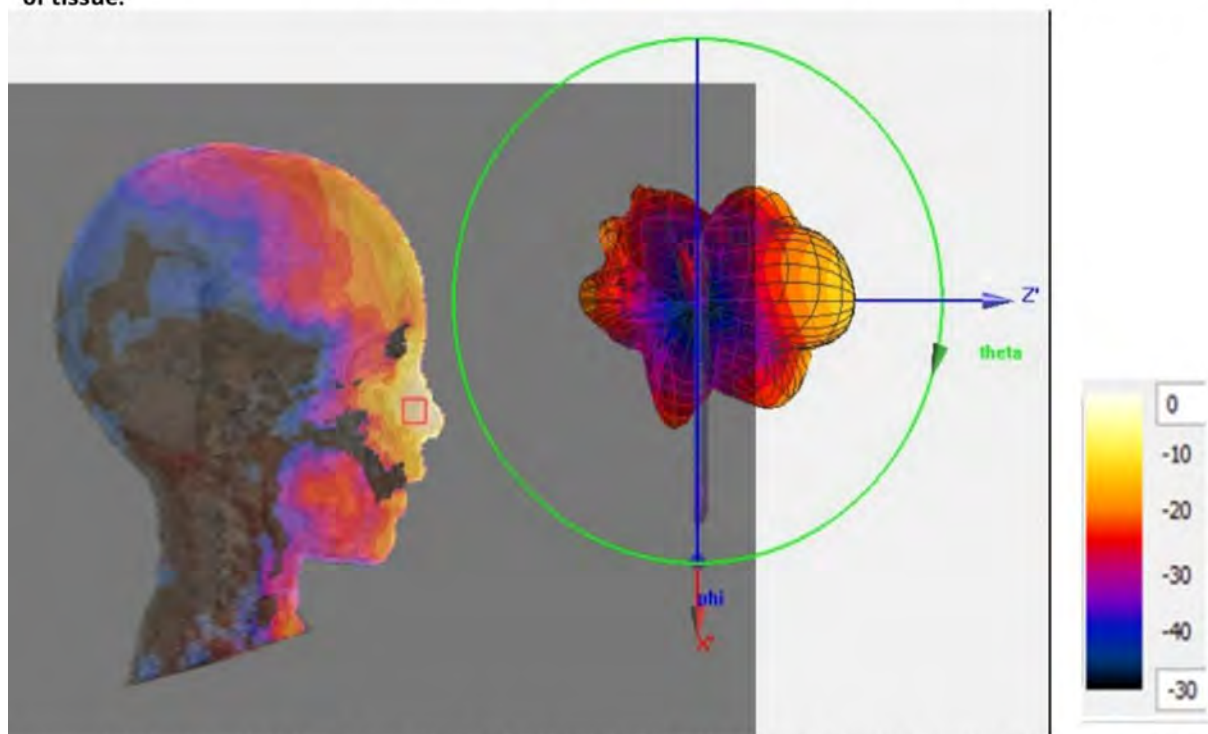
A robust body of research on the male reproductive system specifically has found decreased testosterone⁹² as well as impacts to sperm viability,⁹³ motility and morphology^{68,94–100} from current levels of RFR resulting from use of cell phones or other devices.

The induction of oxidative stress¹⁰¹ is understood to be a key pathway of action that underlies the biological impacts of RFR on the reproductive organs and also can play a major role in the induction of cancer as discussed below.¹⁰¹ At the cellular level, increased free radicals impact mitochondrial metabolism and affect nitric oxide levels and antioxidant mechanisms.¹⁰² RFR may alter membrane transport and integrity, affecting ion (e.g., calcium) transport; these are among mediators of effects of EMFs that lead to cell growth inhibition, protein misfolding and DNA breaks. See Fig. 10.^{56,92}

Acute exposure can stimulate plasma membrane NADH oxidase and increase the production of ROS. Increases in ROS can stimulate endothelial growth factor (EGF) receptors which in turn activate extracellular signal regulated kinase (ERK) pathways. The ERK pathway consists of subsequent activation of

2.45 GHz Wi-Fi enabled tablet in 6 years old child (THELONIOUS)

Radiation pattern normalized to 0.0132 W/g = 0 dB, with a 30 dB color scale, and SAR averaged over 1g cube of tissue.



Ferreira, J., & Almeida de Salles, A. (2015). Specific Absorption Rate (SAR) in the head of Tablet users. The 7th IEEE Latin-American Conference On Communications (Latincom 2015), 1538, 5-9. Retrieved 3 June 2020.

Fig. 9. Radiation pattern from 2.45 Wi-Fi enabled tablet into model of 6-year-old head. Radiation pattern normalized to 0.0132 W/g = 0 dB, with a 30 dB color scale, and SAR averaged over 1g cube of tissue.

Ras, Raf proteins, and mitogen-activated protein kinase (MAPK). The MAPK pathway also has a tumor promoting role. Chronic exposure to ROS can activate various stress kinases (p38 MAP kinase), stimulate the ERK pathway, and also lead to phosphorylation of heat shock proteins (Hsp) that inhibit apoptosis, thereby promoting survival of damaged cells and carcinogenesis. Hsp can increase the permeability of the blood-testis barrier and produce infertility. RFR also can interfere with membrane calcium channels and promote cancer by stimulating ornithine decarboxylase, a rate-limiting enzyme in polyamine synthesis.

Pregnancy is a critical window of vulnerability

In both animals and humans, prenatal EMF exposures have been linked with impaired development of structures and functions of the brain, as well as the reproductive organs and reproductive capacity of

offspring. Experimental and epidemiological evidence indicates that prenatal impacts could range from impaired oogenesis and spermatogenesis, to reduced volume and number of brain pyramidal cells, other serious neuronal impairments, ovarian dysfunction¹⁰³ as well as increased DNA damage in multiple organs¹⁰⁴ of offspring.

Damage to oocytes in female offspring can in turn affect fertility as well as the health of following generations. Daily exposure of young Sprague-Dawley female rats for 2 h of GSM radiation for 1 and 2 months produced inflammation and impairment of ovarian function¹⁰³ consistent with endometritis, a growing problem for young adolescents. Intergenerational impacts are increasingly being understood; a 2021 study of more than 200 mother-daughter-granddaughter triads, found that granddaughters of those who had been in the top third of DDT exposure during pregnancy had 2.6 times the chances of having an unhealthy body mass index by their mid-twenties and

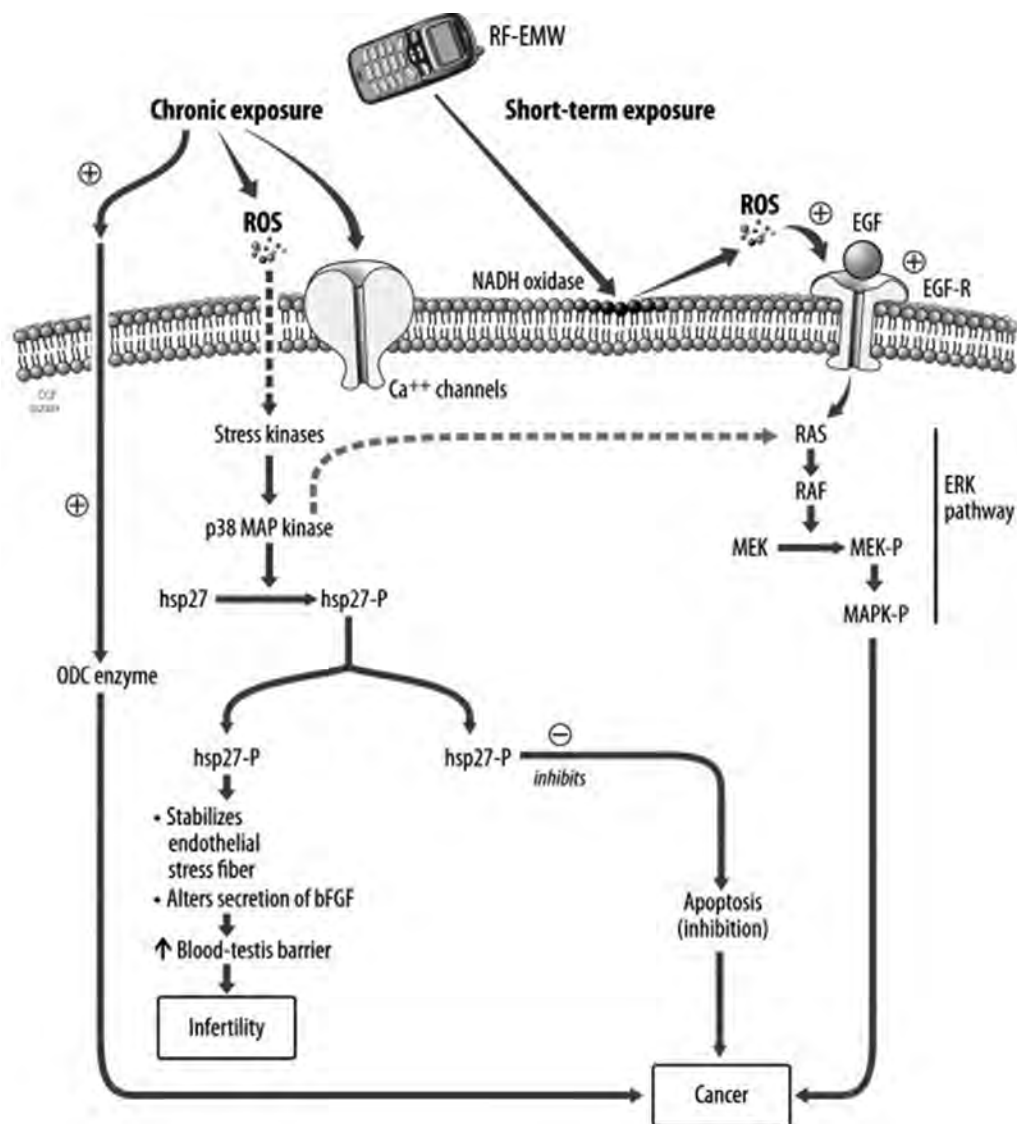


Fig. 10. Acute and chronic impacts of cell phone radiation on male reproduction. The Figure shows various acute and chronic cellular targets of radiofrequency electromagnetic waves (RF-EMW).^{56,92}

were more than twice as likely to have started their periods before age 11—both of which increase their chances of developing breast cancer and other chronic illnesses later in life.¹⁰⁵

Toxicological evidence of adverse impacts of RFR

Experimental studies form the foundation for evaluating pharmaceutical agents and other chemical and physical environmental exposures that can affect pediatric health. *In vitro* studies of well-established animal

cell lines and human cell lines constitute one effective source of information that can be used to predict and prevent harm in humans. Employing validated rodent and other models, both short term and long-term *in vivo* studies on rodents and other animals are employed to clarify physiological consequences of exposures.

Studies of prenatal impacts can yield information on birthweight along with longer term consequences for health of offspring into adulthood. While the key male role ends at fertilization, damage to sperm *in utero* may have transgenerational effects on offspring.¹⁰⁶ There is growing evidence that male-mediated factors

relating both to preconception and fertilization, as well as prefertilization and perifertilization exposures also play roles in determining health outcomes of progeny. In addition, early-life RFR exposures have been demonstrated to cause a range of negative impacts on male and female reproductive health, including damage to the testicular proteome¹⁰⁷ and low birthweight. After a month of 4 h daily controlled exposure to nonthermal levels of cell phone radiation, signaling proteins in the rat testes and sperm production were significantly altered, indicating impaired reproductive function and increased cancer risk.

Experimental studies are especially useful in understanding the roles of avoidable early-life environmental exposures on outcomes that affect children and adolescents, since controlled human studies are unethical. As a result, most human studies that can be used to clarify the impact of RFR are observational. Frequently, such studies are opportunistic, complex and expensive, and also challenging to interpret with poor quality longitudinal data, and limited exposure data, particularly with evolving uses of ever-changing technologies. In the real world, children are exposed to numerous sources of RFR at various frequencies and modulations throughout their daily lives. Smart phones can operate with 5 or more antennae simultaneously sending and receiving radiation to and from towers or routers, as most apps are set to update automatically. Yet, most experimental studies only look at a single frequency at a time.

Prenatal exposures and the central nervous system

Over the past two decades a number of experimental investigations have found that prenatal exposure to some EMF negatively affects both the structure and function of the adult central nervous system (CNS).^{108–110} As an example, a series of experiments by Odaci, Bas and Kaplan and colleagues measuring impacts through stereological analysis demonstrated that rodents exposed prenatally to 900 MHz had fewer cells and more indications of damage in various brain regions of the hippocampus responsible for learning and memory.¹¹¹ Likewise, studies on postnatal exposures of 8 week old rats also found impacts on hippocampal pyramidal cells.^{112,113} This team also found prenatal and postnatal impacts occurred to the Purkinje cells in the cerebellum. The cerebellum is critical to memory, balance and impulse control and

appears especially vulnerable to RFR. Others have hypothesized that RFR might also alter the membrane current of Purkinje cells within the cerebellum. Haghani et al. evaluated properties of Purkinje cells¹⁰⁸ following prenatal exposure to 900 MHz EMF and found that exposed progeny had significantly reduced spontaneous cell firing. While these areas of the brain have been well characterized after prenatal EMF exposure, it is likely that many other areas of the brain are similarly affected.

Prenatal exposures in humans alter behavior and cognition in offspring

Although they are few in number, human studies investigating *in utero* exposure to wireless and other non-ionizing EMF have found a variety of adverse effects on pregnancy outcomes as well as the health of offspring regularly exposed to EMF or EMF/RF.

Several studies by a team from Kaiser Permanente lead by Dr. De Kun Li report a range of impacts to pregnancy and offspring. They measured pregnant women's exposure to magnetic fields (MF) early in pregnancy using an EMDEX Lite meter (EnerTech Consultants Inc.) that measures magnetic field MF exposure for 24 h during a typical day, and providing a detailed diary of activities to allow the researchers to: (1) identify locations of daily activities (at home, at home in bed, in transit, at work, and other); (2) verify if activities were reflective of a typical day; and (3) examine if locations and activities were associated with high MF exposure. Women and their progeny were followed over several years. After controlling for multiple other factors, they found that women who were exposed to higher MF levels had 2.7 times the risk of miscarriage compared to those with lower MF exposure, a finding that corroborated earlier research by the same team.¹¹⁴ Later publications also found higher *in utero* MF exposures associated with childhood obesity, asthma, and ADHD.^{115–117} Similarly designed research¹¹⁸ that measured MF exposure with the EMDEX meter found lower neural volume and bud length, measured by ultrasound, in embryos of women with higher workplace and other exposures to EMF, who were seeking induced abortion of unwanted pregnancies that were terminated in the first trimester. Women in the top quartile of MF exposure had a four-fold increased risk of a shorter embryonic bud length than those in the bottom quartile.

Greater habitual self-reported maternal mobile device use was associated with less infant recovery upon reunion.¹¹⁹

Behavior and cognition in children and adolescents affected by cell phones

Researchers at the University of California School of Public Health in Los Angeles published studies in 2008 (13,159 children)¹²⁰ and 2012 (28,745 children)¹²¹ that found that exposure to cell phones prenatally—and, to a lesser degree, postnatally—was associated with behavioral difficulties such as emotional and hyperactivity problems at the age of school entry. Although smaller studies have not found an association, in 2017 the largest study to date of 83,884 mother-child pairs in the five cohorts reported that high prenatal cell phone use was linked to hyperactivity/inattention problems in children, while no prenatal cell phone use was linked to low risk for any behavioral problems. The association was fairly consistent across and between these large cohorts. The nearly 40% of the cohort¹²² reporting no cell phone use during pregnancy were much less likely to have a child with overall behavioral or emotional problems, while those with the highest reported use during pregnancy had 1.5 times more such problems documented in their children. The authors indicate that the “interpretation of these results is unclear as uncontrolled confounding may influence both maternal cell phone use and child behavioral problems.” Greater habitual self-reported maternal mobile device use was associated with less infant recovery upon reunion.¹¹⁹

In addition, two studies reported consistent evidence associating RFR with lower figural memory performance in adolescents. Foerster et al.¹²³ confirmed Schoeni et al.¹²⁴ in a larger study population of 843 adolescents. Teens who used the phone against one side of their head scored more poorly on tests that measured memory skills specific to the most highly exposed brain regions

Teens who used the phone against one side of their head scored more poorly on tests that measured

Greater habitual self-reported maternal mobile device use was associated with less infant recovery upon reunion.¹¹⁹

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Behavior in animals

In addition to effects on brain development, pre- and postnatal EMF exposures in numerous studies have found that cell phone radiation significantly affects a range of learning, memory, and behavior disorders in rodents.^{125–136} Thus, Aldad et al. showed that prenatal exposures to conventional cell phone radiation throughout

pregnancy resulted in impaired memory and hyperactive behavior, as well as altered neuronal developmental programming, glutamatergic-synaptic transmission onto pyramidal neurons of the prefrontal cortex. Fragoupoulou and Margaritis demonstrated in several studies that animals exposed to radiation have impaired performance on several standard measures of learning. Employing the standard Morris water maze test of hippocampal-dependent spatial memory, they showed that just 2 h per day of exposure to pulsed nonthermal cell phone signals of 900 MHz resulted in significant deficits in performance in exposed animals. Moreover, sham-exposed animals showed the expected preference for the target quadrant, while exposed animals showed no preference. These results indicated that the RFR exposed mice had deficits in their capacity to consolidate and/or retrieve and recall learned spatial information.

Despite these and numerous other studies demonstrating nonthermal impacts of RFR, standard setting groups such as IEEE and ICNIRP generally dismiss experiments that use actual transmitting devices (cell phones, Wi-Fi routers) in their studies, arguing that the exact exposures are not adequately quantified. Indeed, it is true that real devices emit constantly varying signals and erratic pulsation patterns that are more bioactive than can be produced through controlled laboratory simulations.¹³⁷ A number of other expert groups including the ICBE-EMF and ORSAA contend that employing actual phones and devices in controlled studies with shielded systems can yield important findings that are more realistic than those achieved through other means. In fact, experimental

studies employing real mobile phone exposures are fairly consistent in showing adverse effects.¹³⁸ As an example, Aldad and colleagues¹³⁹ provided evidence that prenatal exposures to RFR from an operating phone significantly alter behavior of offspring.

Mice prenatally exposed to cell phone radiation from operating phones (800-1900 Mhz) through gestation exhibited behavioral and neurophysiological alterations that persisted into adulthood.

The prenatally exposed mice were more hyperactive, with diminished memory and decreased anxiety. Findings further demonstrated impairment of glutamatergic synaptic transmission among pyramidal cells in the prefrontal cortex associated with these behavioral changes, suggesting a mechanism by which these exposures could lead to increased prevalence of neurobehavioral disorders. There was a significant trend across the groups treated for 0, 9, 15, and 24 h/day demonstrating that evidence of damage increased in direct proportion to the amount of exposure the animals experienced. Mice prenatally exposed to cell phone radiation from operating phones (800-1900 Mhz) through gestation exhibited behavioral and neurophysiological alterations that persisted into adulthood.

In another example, Broom exposed mice to non-thermal levels of long-term evolution wireless (LTE) 1846 MHz downlink from late pregnancy (gestation day 13.5) to weaning (postnatal day 21) and observed 28-day-old offspring. They found significant effects on both eating behaviors and activity, and concluded that repeated exposure to low-level RFR in early life may have persistent and long-term effects on adult behavior.¹⁴⁰

After finding cell phone radiation exposure affected spatial memory in mice, researchers from the Department of Cell Biology and Biophysics at the University of Athens, Greece conducted experiments

investigating brain proteome responses in mice following whole body exposures to mobile phone or wireless DECT base radiation.¹⁴¹ They found that long-term irradiation from both sources significantly altered the expression of 143 proteins in total, in critical brain regions such as the hippocampus, cerebellum, and frontal lobe. They speculated that these “underexpressed” or “overexpressed” proteins following EMF exposures may play a role in short term or

long-term effects of RFR reported in humans as a consequence of mobile phone exposure, including memory deficits, headaches, sleep disorders, and brain tumors.

Mice exposed to mobile phone radiation at levels well below the permissible ICNIRP exposure limits for human-head exposure (SAR 2 W/kg) induced hippocampal lipidome and transcriptome changes that may underlie brain proteome changes and memory deficits.

Thus, Fragopoulou et al. showed that phone radiation (SAR 0.022–0.366 W/kg), well below ICNIRP limits for human-head exposure but comparable to SAR levels produced in human brain regions induces substantial phospholipid fatty acid remodeling in the brain, on the one hand, and on the other hand, alters the expression of

genes that are implicated in lipid metabolism. These mechanisms are hypothesized to account for the deficits in memory that this group has reported.¹⁴² Mice exposed to mobile phone radiation at levels well below the permissible ICNIRP exposure limits for human-head exposure induced hippocampal lipidome and transcriptome changes that may underlie brain proteome changes and memory deficits.

Carcinogenicity

In 2011 WHO/IARC designated wireless RFR as a Class 2B “possible” carcinogen based largely on

Mice prenatally exposed to cell phone radiation from operating phones (800-1900 Mhz) through gestation exhibited behavioral and neurophysiological alterations that persisted into adulthood.

Mice exposed to mobile phone radiation at levels well below the permissible ICNIRP exposure limits for human-head exposure (SAR 2 W/kg) induced hippocampal lipidome and transcriptome changes that may underlie brain proteome changes and memory deficits.

studies of heavy cell phone users, that found increased risks for tumors both glioblastoma brain tumors and acoustic neuroma, as well as some experimental data with animals. Earlier, in 2002, magnetic field ELF-EMF was also classified Group 2B possible carcinogen due to studies associating residential magnetic field exposure with childhood leukemia.¹⁴³ This association continues to be observed.^{144,145}

Since the 2011 WHO/IARC designation, several large animal^{71,146–148} and case-control human^{149–152} studies investigating carcinogenicity have been published associating RFR with cancer. A 2020 systematic review and meta-analysis¹⁵³ of case-control studies found that 1,000 or more hours of cell phone use, or about 17 min per day over 10 years, was associated with a statistically significant increase in tumor risk.

Experimental carcinogenicity evidence

Every agent proven to cause cancer in humans will also produce it in animals when adequately tested—World Health Organization, International Agency for Research on Cancer

The international gold standard for rodent carcinogenicity studies has been developed by the U.S. National Toxicology Program (NTP), a program supported by several major federal agencies (NIH, CDC, FDA) that carries out transparent studies. To date the NTP has evaluated more than 600 different physical and chemical agents for their potential to cause cancer in animals under carefully controlled conditions. Every agent proven to cause cancer in humans will also produce it in animals when adequately tested—World Health Organization, International Agency for Research on Cancer.

In 2018, the NTP released the results of their large-scale rodent studies on cell phone radiation, which used non-thermal levels of RFR designed to mimic

cell phone exposures. Especially relevant for pediatrics and long-term human impacts is the finding that the rodents exposed prenatally to RFR had significantly lower birth weights compared to unexposed animals. This finding constitutes an important signal that nonthermal radiation levels can impair development, as low birth weight is understood to reflect an important lifelong risk factor for adult health.

The NTP found significant increases in relatively rare and highly malignant schwannomas of the heart and gliomas in male rats. These tumor

types are the same histotype found to be increased in epidemiological studies of long-term cell phone users.

The NTP study also reported increases in DNA damage⁷¹ in both mice and rats and the induction of cardiomyopathy of the right ventricle in male and female rats.^{147,148}

When it was completed in 2018, the NTP study, which followed long-established protocols, was the largest rodent bioassay ever conducted on cell phone radiation that began with prenatal exposures and ended after 24 months of exposures. Soon afterwards, the Ramazzini Institute¹⁴⁶ employing similarly controlled protocols released its findings from an even larger animal study of 2448 rats, which employed both similar and lower exposures comparable to those of base stations

such as Wi-Fi, and observed the same types of malignant tumors—schwannomas of the heart—in male rats. Overall, these two large scale animal studies alongside the human data¹⁵³ provide reasonably strong evidence of the potential for non-thermal levels of RFR to cause cancer in humans.

Analysis of the NTP and Ramazzini data according to current risk assessment guidelines concluded that to be consistent with other toxicological assessments, the protection of children requires that U.S. government

The NTP found significant increases in relatively rare and highly malignant schwannomas of the heart and gliomas in male rats. These tumor types are the same histotype found to be increased in epidemiological studies of long-term cell phone users.

Every agent proven to cause cancer in humans will also produce it in animals when adequately tested—World Health Organization, International Agency for Research on Cancer

FCC limits should be strengthened by 200 to 400 times.¹⁵⁴

U.S. RFR exposure standards would lower current standards by 200 to 400 times, if they were consistent with usual methods for assessing risks for chemical and other hazards.

Cancer epidemiology— Case-control studies

The multi-nation Interphone case-control study¹⁵⁵ from 2010, defined a cell phone user as someone who made one call a week for 6 months. That study did not include any cases from the U.S., was led by the IARC, and reported no overall increased risk of brain cancer with cell phone use, but did find that the highest users of phones incurred the greatest risk. Combining participants with little phone use with those with heaviest use diluted the chances of finding any effect.

The case-control MobiKids study of 352 brain cancer patients between the ages of 10 to 24 reported cell phone use; it also found no overall increased risk for brain tumors in the age group diagnosed between 2010 and 2015. The latency for brain cancer in adults is known to range up to four decades; in children it is believed to be shorter. In fact, only 5% of the study participants—17 individuals—had used cell phones for more than 5 years. Unsurprisingly, no evidence of significant association emerged. This study has also been criticized as methodologically flawed¹⁵⁶ especially as so few of the participants had significant exposures to cell phones. Although no overall increased risk was reported for brain tumors in the temporal region of these young cases an increased risk was found in the age groups 10–14 and 20–24 years—age groups that had lived long enough to have incurred more exposure than the younger children included in this study.

U.S. RFR exposure standards would lower current standards by 200 to 400 times, if they were consistent with usual methods for assessing risks for chemical and other hazards.

Despite major limitations in design, the Mobikids study of cell phone use in Canadian children reported a doubled risk of glioblastoma multiforme from using cell phones, a risk that should provide a sobering message to those that seek to prevent such disease from occurring in the first place.

gland tumors—tumors plausibly linked with cell phone radiation, but they did note a significant association with glioma.

For glioma, when comparing those in the highest quartile of use (>558 lifetime hours) to those who were not regular users, the odds ratio among Canadian children participating in Mobikids was 2.0 (95% confidence interval: 1.2, 3.4). After adjustment for selection and recall biases, the odds ratio was 2.2 (95% confidence interval: 1.3, 4.1).

Despite major limitations in design, the Mobikids study of cell phone use in Canadian children reported a doubled risk of glioblastoma multiforme from using cell phones, a risk that should provide a sobering message to those that seek to prevent such disease from occurring in the first place.

More recent case-control studies of glioma in adults from Sweden¹⁵⁷ and France,¹⁴⁹ and systematic analyses that combine data on adult cell phone users carried out in China find 10 years or more of cell phone use significantly associated with increased risk of glioblastoma, with 20 years of exposure resulting in a more than doubled risk. Analyses of shorter-term exposures, such as predominated in the Interphone study, do not find such an association, suggesting that there is a latency of 10 years or more for glioblastoma. Thus, in those few studies that have followed longer term users, more hours of use and longer time periods of use have been found significantly associated with between a 40% to more than 200% increased risk of glioblastoma.

Researchers examining the Canadian MobiKids cohort carried out sophisticated statistical modeling including potential sources of biases and probabilistic methods, and did not find strong evidence of an association between reported cell-phone use and meningioma, acoustic neuroma, or parotid

Cancer epidemiology— Cohort studies

In contrast to case controls studies, the UK ‘Million’ Woman Cohort study and the Danish Cohort Study constitute two studies often cited as proof that there is no relationship between cell phone use and brain cancer. Both have been roundly criticized for serious shortcomings. For example, in the UK cohort study of almost 800,000 older menopausal women, only 18% of cell phone users¹⁵⁸ talked 30 or more minutes per week, as self-reported from 2001 to 2011. Yet, the U. K. study combined slight and regular mobile phone users into a single category and compared them with those who reported no phone use. More than 80% of UK households had landlines during the study period. It is likely many in this cohort also used cordless phones, yet, this significant additional source of RF was not evaluated. In fact, the UK cohort authors acknowledge¹⁵⁹ their study was unable to assess the risks associated with considerably greater levels of exposure. Consequently, the authors note that: “advising heavy users on how to reduce unnecessary exposures remains a good precautionary approach.”

Other cancers plausibly reported in epidemiological studies to be tied with cell phone radiation include: thyroid cancer, early-onset breast cancer, early-onset colorectal cancer, and testicular cancer. In a certain subset of those with a common genetic susceptibility, heavy cell phone usage is associated with significantly doubled risk of thyroid cancer.⁶⁹ Since the advent of smart phones in 2010, phone antennas tend to be located at the bottom of phones. As a result, peak phone RFR exposure is more likely to occur in the neck than in the brain.¹⁶⁰ Smart phones include several different antennas, each one of which can send and receive RFR, with multiple antennas for data, photos, video and other applications located around the phone perimeter. In addition, women who have carried phones in their bras or worn Vocera devices next to their chest have developed unusual patterns of breast cancer, with tumors sometimes appearing precisely under the areas where their phone antennas were located.^{161,162}

In those few studies that have followed longer term users, more hours of use and longer time periods of use have been found significantly associated with between a 40% to more than 200% increased risk of glioblastoma.

Several independent analyses published since the original IARC assessment in 2011 conclude that if the criteria that the WHO/IARC relied on when determining carcinogenicity were applied to current science, this would result in classification of cell phone radiation as a probable carcinogen (Group 2A) or proven (Group 1) human carcinogen.^{7,8,16,163–167}

Unexplained increases in pediatric and young adult cancers are consistent with increasing wireless exposures

Trends in cancer can provide signals about underlying etiologic factors, as occurred with increases in lung cancer in male and female smokers in the mid-twentieth century, and increases in the rare clear-cell adenocarcinoma of the cervix in young women whose mothers had used diethylstilbestrol to prevent miscarriage.¹⁶⁸ Cancers tend to have multiple contributory causes, which can ebb and flow over time. Over the last several decades, incidence of several different early-onset cancers in adults¹⁶⁹ below 50 years of age have increased in many nations, including those of the breast, colorectum, bone marrow, and thyroid. Although explanations for these patterns will certainly be multi-factorial, wireless radiation is one of the factors that should be more widely explored.

Rates of rectal cancer have quadrupled in those under age 24 in the past decade in the U.S. and Iran and risen rapidly¹⁷⁰ in the U.K, Egypt, and Brazil. One recent study¹⁷¹ asserts that these increases could, in part, be associated with radical changes in exposures to cell phone radiation due to devices kept close to the body for extended periods of time. More and more children and young adults keep transmitting smartphones with their multiple antennas that are constantly updating apps next to their abdomens inside their tight clothing for hours a day, along with a wireless earpiece in their ear. Thus, although speaking directly into phones has declined, close proximity to their radiation has not.

What makes the potential connection between colorectal cancer increases and cell phone exposures

especially plausible is an experimental study showing that colon and rectal cells are exquisitely sensitive to non-ionizing radiation like that emitted by phones today. Moreover, exposure to non-ionizing mobile phone radiation can lead to effects on treated colon tissues of rats similar to those observed from ionizing 3Gy gamma radiation. Mokarram et al.¹⁷² reported that epigenetic patterns of the estrogen receptor (ER α) after exposure to ionizing radiation paralleled those occurring after exposure to non-ionizing RFR. Using biomarkers that have previously been established to signal damaging exposures, they further found that methylation patterns may constitute an important validated biomarker of exposure to radiofrequency radiation that has the potential to play a role in the expression and promotion of colorectal cancer.¹⁷²

RFR has all the classic hallmarks of endocrine disruptors that affect reproduction, development of the hypothalamic-pituitary-gonadal axis (HPG) and alter normal male and female reproductive endpoints.

EMFs as endocrine disruptors

Endocrine disruptors are understood to be agents, either natural or man-made, which can mimic or interfere with the body's hormones and disrupt development leading to a range of developmental, reproductive, neurological, and immune problems, as well as cancers. Common sources include plastics, metal can liners, detergents, flame retardants, and pesticides.

EMF exposures have been linked to a range of classical endocrine disrupting effects.

A team from the California Institute of Behavioral Neurosciences & Psychology reviewed the effects¹⁷³ of both RFR and ELF on thyroid gland hormones and histopathology and found evidence that RFR was associated with alterations in T3, T4, and TSH hormone levels, disruption of the function of the HPG axis leading to thyroid insufficiency and hyper-stimulation of thyroid gland follicles. This caused apoptosis of follicular cells. Non-ionizing radiation was seen to be significantly associated with histopathological changes in the thyroid gland follicles and the authors contend that non-ionizing EMF radiation

might be responsible for the recent increase in the incidence of thyroid insufficiency and cancer in the general population.

Critical research needs to be conducted to understand the effects especially to future generations. Cantürk et al.¹⁷⁴ investigated the effects of pre- and postnatal 2450 MHz RFR on the thymus of rats over four generations and found that the number of pups and weight of all rats decreased significantly in the third-generation.

Thus, it appears that non-ionizing¹⁷⁵ RFR has all the classic hallmarks of endocrine disruptors that affect reproduction, development of the hypothalamic-pituitary-gonadal axis (HPG) and alter normal male and female reproductive endpoints. Alterations in spermatogenesis and oogenesis, for example, in turn affect a num-

ber of endocrinological and other functions throughout life, including fertility and behavior in offspring along with the risk of cancer, neurological disorders and other chronic illnesses.

Animal studies of additive or synergistic effects of RFR with other agents

Replicated experiments show that RFR can have important co-carcinogenic and tumor promoting effects when combined with known carcinogens. Lerchl et al.¹⁵² found carcinogen-induced tumor rates were significantly higher in mice exposed to nonthermal doses of radiofrequency below current regulatory limits. The authors argued that it was a "very clear indication that in principle tumor-promoting effects of life-long RFR exposure may occur at levels supposedly too low to cause thermal effects."

The Ramazzini Institute performed two large lifespan rat cancer studies¹⁷⁶ combining magnetic field non-ionizing EMF with either acute exposure to gamma radiation or chronic exposure to formaldehyde in drinking water and found significantly greater incidence of malignant tumors with either co-exposure than occurs without such combined exposures.

Investigators from the Beijing Institute of Radiation Medicine in China have also produced important evidence of synergistic effects. They determined that combining 2.8 GHz and 1.5 GHz microwaves¹⁷⁷ impaired spatial memory much more strongly than exposures to a single frequency. It is important to realize that such combined frequencies can easily occur at this time within a single smart phone that can operate on different frequencies at the same time. This same team has reported¹⁷⁸ that exposure to nonthermal levels of 2.8 GHz and 9.3 GHz—as could occur with 5G networks—led to significant impacts to the thymus and spleen, such as congestion and nuclear fragmentation of the lymphocytes, and more severe injuries. Their transcriptomic and proteomic analysis of peripheral blood and spleen suggested that alterations of DNA replication, cellular metabolism, and signal transduction might be involved in microwave-induced immune activation. The spleen not only filters blood-borne pathogens and antigens but also plays a critical role in immune system regulation.

Effects of screen time

Higher levels of adolescent screentime,¹⁷⁹ social media access¹⁸⁰ and cell phone use in teenagers' bedrooms are associated with reduced sleep time¹⁸¹ as well as negative effects on daily functioning,¹⁸⁰ behavior¹⁸² and mood. An ever growing body of evidence¹⁸³ is associating¹⁸⁴ children's addictive and excessive use of screens and digital media with a myriad of adverse social (relationships, social skills, cyberbullying), psychological (anxiety, depression, suicidal ideation, obsessive compulsive disorder¹⁸⁵) neurodevelopmental (cognitive development, behavior, attention, speech¹⁸⁶) and physical (obesity, high blood pressure) consequences. Key factors¹⁸⁷ determining screen time effects include duration, content, media type, degree

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Axelsson et al.¹⁸⁸ found the amount of time spent with screens predicted shorter sleep in preschoolers. Regardless of the time of day that screens were accessed by children, greater screen time was associated with poorer sleep quality, poor communication, poor problem solving and greater attention problems. The AAP notes,¹⁸⁴ “the prevalence of problematic

of access to social media, whether screens are located in the bedroom¹⁸⁰ and the amount of after dark/evening use.^{180,187}

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Internet use among children and adolescents is between 4% and 8%.

Up to 8.5% of U.S. youth 8 to 18 years of age and 4.6 % of Chinese youth meet criteria for Internet gaming disorder defined by the World Health Organization in its standard Diagnostic and Statistical Manual of Mental Disorders-Fifth Edition (DSM-5) as an uncontrollable, persisting need to engage directly with digital media and games that cannot be stopped.

This diagnostic code is included in the DSM-5,¹⁸⁹ and

in the 11th Revision of the International Classification of Diseases (ICD-11⁶), signaling interference with socialization, including disturbing important areas of life such as family relationships, school, work, eating, bathroom habits and sleep. In its criteria for gaming disorder, the WHO does not include in its criteria any specific number of hours spent with screens, but instead focuses on the inability to engage in normal social life of young children and teens, including outdoor activities as well as socializing indoors with family and at school. The category of internet gaming disorder was added in 2019. According to Pew,¹⁹⁰ 97% of teen boys and 83% of girls play games on

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some kind of device. How many of them are addicted is a matter that should be seriously examined, as the toll on pediatric mental and physical health continues to mount.

Higher screen time has been associated with a higher prevalence of prospective disruptive behavior disorders.¹⁹¹ Clinicians^{187,192} posit that the effects of electronic screen time can mimic or exacerbate psychiatric disorders as the interactive media can lead to chronically high arousal levels which can lead to nervous system dysregulation. As a consequence, treating physicians have developed treatments including an “electronic fast” to rebalance the brain and relieve

overstimulated reward (addiction) and sensory pathways. Interventions such as reducing screen media have been found to result in a substantial increase in children’s engagement in physical activity¹⁹³ and increasing outdoor “green” time¹⁹⁴ is beneficial to mental health as well as lowering myopia incidence¹⁹⁵ in school-aged children.¹⁹⁶

Technoference contributes to speech and bonding delays

Studies¹¹⁶ of infant parental dyads find that more frequent reported mobile device use was associated with less room exploration and positive affect, and less recovery (i.e., engagement with mother, room exploration positive affect) even when controlling for individual differences in temperament. Delays in speech acquisition¹⁹⁷ and the development of interactive skills also have been reported in infants of parents that use devices more frequently. In addition, the phenomenon of “technoference”¹⁹⁸ is receiving increased attention from experts in behavioral and development psychology. Heavy parental digital technology use has been associated with suboptimal parent-child interactions. Parental problematic technology use—termed “technoference”—is associated with technology-based interruptions in parent-child interactions

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and potentially associated with a range of child behavior problems.

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Parental distraction in early infancy can be problematic for obvious reasons. This remains a

topic of increased research attention and a matter that should be routinely queried at every well child visit, beginning with infancy throughout the school years. Simple questions noted below can provide the foundation for teachable moments that convey the need for direct parental involvement in early years when lifelong benefits can accrue. Harried young parents, especially those who are raising children without partners, may rely heavily on digital devices as a form of child-care. They should be informed about the importance of direct eye and verbal contact with infants, as well as reading aloud starting in infancy, as these practices have been shown to have lifelong benefits to social and emotional development.

Clinical practice guidance

Avoidable environmental exposures can profoundly affect and alter children’s development and health. Along with the benefits of nutrition and regular physical and social activity, clinicians are aware of adverse effects of lead, pesticides, food additives, air pollution, ultraviolet radiation, and more broadly climate change, on children’s health. Exposures that take place early in life can have disproportionately large impacts on later life health and well-being.

As recommended by the AAP, clinicians can integrate developmental as well as EMF issues in practice

by regularly discussing screentime and digital media use. AAP guidance regarding phones and other wireless devices should be widely shared and employed. These include:

- For children under 18 months, avoid screen-based media except video chatting.
- For children 18 months to 24 months, parents should choose high-quality programming and watch while interacting with their children, on a limited basis.
- For children 2 to 5, no more than one hour per day of high-quality screen time and engage with children regarding content and experiences.
- For children 6 and up, establish consistent limits on the time spent using media and the types of media.

Recognizing that RFR may contribute to ill health provides further incentive to include clinical practices such as:

- Query use of screens, digital media, cell phones and Wi-Fi linked devices at yearly physicals;
- Provide guidance to patients and their families on how to decrease excessive screen time and to reduce RFR exposure (See Section 7);
- Respond with additional interview questions, resources and referrals as appropriate if symptoms potentially related to use of screens or exposure to EMFs are reported;
- Engage in continuing education and training on EMF issues, and screen use;
- Record and report cases where links have been identified between EMF and symptoms or health outcomes;
- Encourage undistracted reading out loud to infants and young children; and
- Develop family media plans for parents as well as children, explaining that parental distraction with devices can impair child development including speech acquisition.

Practitioners also need training in EMF-related effects to be able to discern whether common pediatrics complaints such as headaches and problems sleeping could, in fact, be due to the excessive use of technologies in the home or school environment. Clinicians encountering patients presenting with unexplained symptoms can consider the complete clinical picture and health history, and investigate, treat if necessary, or exclude commonly recognized etiologies.

For example, patients may come into the office with unexplained array of symptoms such as headaches and rashes that may be related to EMF (e.g., cell antennas recently mounted nearby, or upgraded school Wi-Fi system recently installed). Clinicians need greater awareness so that in differential diagnosis they include the possibility that symptoms may be associated with EMF and evaluate the patient in a systematic fashion.

Clinical practice guidelines for EHS have been developed by trained clinicians and experts,¹⁹⁹ EUROPAEM group,²⁰⁰ Dr. Riina Bray, Medical Director, Environmental Health Clinic, at Women's College Hospital, University of Toronto²⁰¹ and the Austrian Medical Association,²⁰² among others.

Clinical practice guidelines include:

- Comprehensive case history that includes environmental exposure history including questions regarding typical daily EMF/ RFR exposure, toxic metal exposures, diet, mold, and other potentially toxic chemical exposures at home, child care settings, school, work and play, and in the community.
- Assess community, work, school and home exposures to EMFs: proximity of cell phone towers, routers, DECT cordless phones, and any other wireless technology, especially in sleeping areas
- Assess variation of health problems depending on time and location. For example, do headaches or other unexplained symptoms attenuate in different areas, but return chiefly when the child is in one specific location? Did headaches or symptoms begin when a new router or cell antenna was installed?

As technologies (and healthier alternatives) evolve and knowledge advances, there is a need for clinicians periodically to update their knowledge through continuing medical education with technical experts in bioelectromagnetics—a field that is not widely taught or studied in medical schools at this juncture. Some accredited programs²⁰³ offering up to 24.5 continuing medical education credits can be found online.

Electromagnetic sensitivity—An underdiagnosed pediatric problem

The phenomenon of hyper-reactivity to chemical and physical phenomena remains poorly understood but is believed to be a serious and sometimes disabling problem.

Electromagnetic hypersensitivity (EHS)²⁰⁴ is believed to affect a small but significant segment of the population—with estimates up to 15%. Its prevalence in children has never been evaluated, but could prove to be important in cases in which vague symptoms of headache, numbness, tingling and rash cannot otherwise be alleviated. EHS is characterized by headaches, sleeping problems, memory problems, nosebleeds, unexplained skin rashes, digestive problems, neurological problems, heart palpitations and fatigue. Symptoms²⁰⁰ vary from person to person, making this a challenging subject to study and to treat. Notably, prenatal and postnatal exposure to cell phone RFR is linked to increased headaches in children,²⁰⁵ adolescents,²⁰⁶ and adults,²⁰⁵ and use of smartphones have been identified as a trigger for migraines.²⁰⁷

EHS symptoms²⁰⁸ have been linked to exposures to non-ionizing EMF, including from nearby cell towers and base station wireless antennas and routers. No studies have been conducted on EHS in children. Dieudonné²⁰⁹ studied forty individuals convinced that they were sensitive to electromagnetic fields, and concluded that contrary to allegations of nocebo responses, attribution of their symptoms followed a common linear model: (1) onset of symptoms; (2) failure to find a solution; (3) discovery of EHS; (4) gathering of information about EHS; (5) implicit appearance of conviction; (6) experimentation; and (7) conscious acceptance of this knowledge.

Further evidence of the importance of identifying sources of exposure and reducing them comes from a recent report from Sweden on the sudden acquisition of highly reactive biological responses to a newly introduced source of RFR. Following the introduction of 5G networks in a dense urban environment, a previously healthy couple reported disabling symptoms of headache, palpitations, tingling, tinnitus and major discomfort. Upon detailed examination of their environment, it was determined that 5G network had recently been installed quite close to their apartment. A thoroughly

detailed case report²¹⁰ documents this sudden change in RF exposure and the onset of severe symptoms in this couple just a few days after the installation of a 5G base station on the roof above their apartment. The deployment of 5G caused a dramatic increase in maximum (peak) microwave radiation exposure, from 9 000 $\mu\text{W}/\text{m}^2$ to $>2\,500\,000\,\mu\text{W}/\text{m}^2$. The symptoms quickly reversed when the couple moved to a dwelling with much lower exposure.

Symptoms often are misdiagnosed as health professionals lack training on the matter. Preliminary clinical practice guidelines²⁰¹ have been developed. The U.S. Access Board²¹¹ has recognized that “electromagnetic sensitivities may be considered disabilities” under the Americans with Disabilities Act, and the Job Accommodations Network supported by the U.S. Department of Labor’s Office of Disability Employment Policy has issued a list of guidelines²¹² for accommodation of electromagnetic sensitivity.²¹³ Adults in the U.S. are often accommodated in the workplace (being provided hardwired computer connections, or moving to a lower-EMF office) but in many cases they have had to file legal actions.

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Despite these accommodations for adults, parents seeking accommodations in U.S. public schools for children who experience EHS have been challenging as schools will refuse to accommodate and the families often must resort to home-schooling. In the UK, parents won a legal battle²¹⁴ against local authorities who are now compelled to provide an environment with reduced wireless radiation so that their child can attend school. There are also other examples internationally of legal decisions mandating workplace accommodations or payment for injuries²¹⁵ from EMF exposure.

In Canada, EHS is described in the report, Medical Perspectives on Environmental Sensitivities²¹⁶ to the Canadian Human Rights Commission.²¹⁷ Medical and legal²¹⁶ reports underpin a policy²¹⁸ for accommodation under the *Canadian Human Rights Act*.

Synergistic and combined toxic exposures in children

Children are exposed to numerous combinations of environmental exposures over their lifetime. Even where exposures are low, they can interact with each other resulting in additive or synergistic results.

Animal and human studies²¹⁹ indicate that non-ionizing EMF can act synergistically when combined with other toxic agents. For example, Sueiro-Benavides et al.²²⁰ found that 2.45 GHz, a frequency used in Wi-Fi networks, combined with carbon black (CB) increased CB-induced toxicity and prolonged inflammatory immune responses. Exposures to non-ionizing EMF from magnetic resonance imaging (MRI) or cell phones has been found to enhance the release of mercury from dental amalgam.²²¹ RFR has been found in several studies to impact the integrity of the blood-brain barrier that protects the brain from toxic molecules circulating in the blood.^{132,222–225}

A longitudinal study²²⁶ of 2,422 children at 27 elementary schools in 10 Korean cities examined effects and interactions between voice call cell phone use and blood lead levels (lead levels were comparable to those in U.S. children). Attention-deficit/hyperactivity disorder symptom risk was significantly greater in the children with above-median lead levels and above-median weekly cell phone call duration.

A similar interaction was reported by Choi et al.²²⁷ Across the cohort, maternal cell phone use during pregnancy was not associated overall with child neurodevelopment during the first three years. Among children exposed to higher maternal blood lead level *in utero*, however, a greater risk of both a poorer psychomotor development index and a lower mental development index up to 36 months of age was associated with higher cell phone calling time or frequency during pregnancy.

A theoretical role for RFR in the etiology of autistic spectrum disorder

Autism remains a puzzling and troubling problem for growing numbers of children, their families and their physicians. The disease²²⁸ is increasing among both males and females, and among nearly all racial/ethnic subgroups, from 4.2 per 1,000 in 1996 to 15.5 per 1,000 in 2010. A recent report from the U.S.

Centers for Disease Control and Prevention notes that rates have continued to increase. The prevalence of autism spectrum disorder (ASD) among 11 surveillance sites is 1 in 54 among children aged 8 years in 2016 (or 1.85%). This constituted a 10% increase from 2 years previously when it was 1 in 59, and the highest prevalence since the CDC began tracking ASD in 2000. Consistent with previous reports, boys were 4 to 5 times more likely to be identified with ASD than girls. The rate for ASD is 1 in 34 among boys (2.97 percent) and 1 in 145 among girls (0.69%). Although many environmental factors²²⁹ have been posited, including air pollution, pesticides, and heavy metals, the potential role of RFR should also be seriously explored.

Experimental studies showing that prenatal exposures to RFR can disrupt the development of the hippocampus provide some foundation for speculating that EMFs could also be a contributing factor. Thus, RFR has plausibly been hypothesized to play a role in the development of ASD via disruption of the developing poorly myelinated central nervous system. When presented with serious behavioral disorders including autism, some psychiatrists have employed successful treatment protocols that involve family management systems to facilitate cessation and withdrawal from use of digital devices. Psychiatrist Victoria Dunckley¹⁹² notes that early use of digital devices can create a heightened state of fight or flight among young brains and bodies, placing them under constant stress. Children are easily addicted to routines of falling asleep, eating and even using the toilet accompanied, not by parents soothing assurances, but by digitized music, visions and sounds that increase dopamine—the brain chemical tied with pleasure and addictive behaviors. Providing several impressive case reports of toddlers that had been out of control and unable to give up their digital fixations, Dunckley notes that digital fasting can yield impressive results, especially with children on the autism spectrum. Her book provides several detailed instances where altering children's access to digital devices can radically improve behavior. Other published reports also offer corroboration for this hypothesized connection.^{230,231}

Psychiatrist Martha Herbert and research analyst and editor of the *Bioinitiative Report*, an ongoing record of relevant scientific findings, Cindy Sage, among others,

have called for more aggressive investigation of the possible connections between RFR uses and exposures and disorders on the autism spectrum. They speculate that behaviors on the autism spectrum could emerge from alterations of electrophysiological oscillatory synchronization and EMF/RFR could contribute and “worsen challenging biological problems and symptoms; conversely, reducing exposure might ameliorate symptoms of ASD by reducing obstruction of physiological repair.”^{232,233}

Inadequate regulatory limits

FCC and ICNIRP regulatory limits have been long criticized by experts and the court because they do not address children’s unique vulnerability, the biological and health effects of long-term exposure nor the current ways that children are exposed to cell phone and wireless radiation. In 2012, the AAP wrote the FCC and other federal agencies calling for an update to the FCC’s 1996 exposure limits stating, “it is essential that any new standard for cell phones or other wireless devices be based on protecting the youngest and most vulnerable populations to ensure they are safeguarded throughout their lifetimes.” A decade later that call remains unanswered.

Cell phone and wireless device limits

Regulations regarding human exposure to RFR include: 1. allowable limits for ambient exposures created by cell tower network emissions and wireless networks, called maximum permissible exposure limits in the U.S.; and 2. exposure limits for localized exposures into areas of body tissue from phones, and personal and household devices, referred to as Head and Body SAR limits. The ICNIRP and IEEE³⁸ standards used as the basis for many governments’ limits remain largely unchanged since the 1990s and they are intended to protect for effects caused by short term high powered exposures. These limits are not designed to protect for

effects from long term, low level chronic exposures because ICNIRP and IEEE do not consider such effects as “established.” As former ICNIRP member James C. Lin describes them: “*They are flawed and are not applicable to long-term exposure at low levels. Instead of advances in science, they are predicated on misguided assumptions with outdated exposure metrics that do not adequately protect children, workers, and the public from exposure to the RF radiation or people with sensitivity to electromagnetic radiation from wireless devices and systems. Thus, many of the recommended limits are debatable and absent of scientific justification from the standpoint of safety and public health protection.*”¹⁶

Wireless network exposure limits

U.S. limits for RFR were promulgated by the FCC in 1996, based largely on a 1986 Report of the National Council on Radiation Protection & Measurements (NCRP)²³⁴ and the Institute of Electrical and Electronics Engineers (ANSI/IEEE) C95.1-1991 standard.²³⁵ The U.S. limits for environmental RF levels are among the most lenient in the world, and are similar to those of Australia, Japan, Germany and other countries that also adopted inadequate ICNIRP limits.

However, some countries, including Italy, Switzerland, China, and Russia have adopted regulatory limits for cell towers and base station network emissions that are far more stringent²³⁶ than the thermally based limits of the U.S. FCC and ICNIRP.

European nations with more stringent regulatory limits set their policies based on the precautionary principle, a key framework used in their decision making process. This principle rests on the sage advice of Benjamin Franklin—better to be safe than sorry.

In 2011, the Parliamentary Assembly of the Council of Europe (PACE) Resolution

In 2011, the Parliamentary Assembly of the Council of Europe (PACE) Resolution 1815: The potential dangers of electromagnetic fields and their effect on the environment ”²³⁷ strongly recommends that the ALARA (as low as reasonably achievable) principle is applied, covering both the so-called thermal effects and the athermic or biological effects of electromagnetic emissions or radiation.”

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called thermal effects and the athermic or biological effects of electromagnetic emissions or radiation.”

In contrast, the more strict RF limits in Russia and China²³⁸ are considered “science based,” not precautionary, and were developed based on their own government scientists’ studies of the biological effects of nonthermal RFR levels. India lowered its limits to 1/10 of ICNIRP limits in 2012²³⁹ in response to a report from an Inter-Ministerial Committee that reviewed the research²⁴⁰ on impacts to wildlife, including honeybees and other pollinating insects, and concluded²³⁹ that the “vast majority of published literature indicate deleterious effects of EMFs in various species.” (See Fig. 7 for comparisons) It is notable that other groups have recommended even lower limits. For example, the *Ecolog Report*, commissioned by T-Mobile and Deutsche Telekom in 2000, reviewed the science recommended a limit of 0.01 W/m² to “be rigorously adhered to by all base stations near sensitive places such as residential areas, schools, nurseries, playgrounds, hospitals and all other places at which humans are present for longer than 4 hours.”²⁴¹

Why the SAR standard is inadequate to protect children

Pre-market tests for cell phones and wireless devices measure the Specific Absorption Rate (SAR), which is the standard accepted measurement of the rate of RF (radiofrequency) energy absorption. (See Table 2.) For cell phones and other handheld wireless devices, many countries have adopted either FCC or the ICNIRP limits for premarket RF compliance. Although the FCC limit is slightly more restrictive compared to ICNIRP limits, both rest on avoiding the effects of heating as measured by the SAR.

The SAR metric is criticized as a heat-based measure unable to capture⁷² the numerous characteristics²⁴² of nonthermal exposure considered relevant to bioeffects such as pulse, modulation, variability or duration of exposure.

That said, even if the SAR was a valid measure for health effects thresholds, the SAR testing protocol itself has long been criticized as unrealistic for numerous reasons. To start, it does not take into account the smaller sizes of women, infants and children, and other properties of children that place them at greater vulnerability. Thus, the child brain sits in a thinner skull that contains more fluid which can absorb more

radiation per unit volume than the adult brain with its thicker skull.

In regards to children’s exposure, the AAP¹ wrote the FCC in 2012 noting that, “although wireless devices sold in the United States must ensure that they do not exceed the maximum allowable SAR limit when operating at the device’s highest possible power level, concerns have been raised that long-term RF exposure at this level affects the brain and other tissues and may be connected to types of brain cancer, including glioma and meningioma,” and also that, “The current metric of RF exposure available to consumers, the Specific Absorption Rate, is not an accurate predictor of actual exposure.”

The head and body phantom are filled with a homogeneous liquid that does not capture the way the electromagnetic field moves through different tissues in the head such as brain tissue, which is of varying thicknesses and characteristics. The dielectric properties of tissues in children’s head and brain differ from adults because children’s tissues have more water content and thus are more conductive than adults.

The SAM model has long been argued to provide a conservative estimation of the exposure from a mobile phone, even for children. However, research supporting this position has generally used a scaled down version of an adult head which did not account for all age dependent variations in children, such the anterior fontanels which close between 7 and 18 months. When these more realistic variations are accounted for, the SAR values for children are significantly higher. For example, Mohammed²⁴³ used realistic head models in several scenarios simulating young children between 3 months and 18 months holding phones near their ear and mouth as well as a person holding a mobile phone near a child’s head. They found that 10g SAR values in the heads of young children are significantly higher than those for adults and also noticeably higher than the scaled models used in previous studies that considered dosimetry for children over 3 years old.

Research supporting the SAM model²⁴⁴ is based on early phone models that were designed with antennas on the top of the phone body and more recent research has found that for newer phone models with antennas integrated along the bottom of the phone, the SAM does not always ensure⁴⁰ a conservative estimation.

Phones are tested while operating at the highest power level, in specific positions against the phantom head and body. Devices generally operate at the minimum necessary power, in order to maximize battery

life, but in many situations the power output is much higher, to ensure reception at the receiving antenna in the cellular base station. Low incoming signal strength triggers a significant increase a phone's emissions; people encounter low signal strength in rural areas far from base stations and also, for example, in rooms in basements or buildings where building materials block the signal. The many real world exposure scenarios result in highly variable emissions from any one cell phone model, regardless of the stated SAR value.

Although the standardized SAR test positions are supposed to simulate the way people typically hold a cell phone, the standardized positions do not test in body contact positions for body SAR tests. The test positions do not mimic a cell phone in full body contact such as in a pants pocket or resting against the abdomen. Parents today often hold their newborns with the cell phone right up against the baby and yet premarket SAR tests do not include such positions.

In summary, the SAR test and SAM have been roundly criticized as underestimating and not adequately capturing the real world exposures of children, babies, and toddlers, and children who are positioned in direct or close body contact with cell phones or other devices.

Furthermore, manufacturers SAR test phones at various distances from the body. In the U.S. a manufacturer can decide to test for body SARs at 5, or 10, or even 25 mm. The measured SAR value will increase the closer the phone is tested to the body phantom. Thus, the manufacturer posted SARs of different models that use different separation distances cannot be directly compared to each other.

Although SAR levels often are used to compare cell phones in terms of which phone emits more RF than others, the SAR value does not necessarily reflect a difference in a consumer's actual exposure for these reasons. Hence a phone with a lower SAR level does not necessarily mean lower RF exposure. Nonetheless, the SAR is the metric in use and the basis for exposure limits worldwide.

Regulatory gaps affecting children

The AAP¹ has long advocated¹ that federal agencies strengthen regulations calling for:

- A reassessment of human exposure limits and testing requirements to ensure children's unique

vulnerabilities are addressed and to reflect the way children use phones today in close proximity to the body;

- Establishing a federal research program as the basis for exposure standards;
- Cell phone and wireless device product labeling requirements to "enable parents to better understand the potential dangers of RF energy exposure and protect their children."

The AAP supported²⁴⁵ national legislation, the Cell Phone Right To Know H.R. 6358,²⁴⁶ proposed in 2012, which would have addressed numerous regulatory gaps in federal policy regarding stating that, "Children are disproportionately affected by environmental exposures, including cell phone radiation. The differences in bone density and the amount of fluid in a child's brain compared to an adult's brain could allow children to absorb greater quantities of RF energy deeper into their brains than adults."

Prevention: medical organization, public health, government policy and actions to mitigate risk to children

Based on the established science, including children's special vulnerabilities, trajectories of exposures and diseases, clinicians need to know that they are supported by medical associations, have the resources to support their patients, and finally have the evidence in hand to advocate for them. A few of the supportive agencies and recommendations are noted below. Others can be found at www.ehtrust.org.²⁴⁷

Medical organizations and public health agencies

The AAP and several international medical organizations^{248–251} have recommendations²⁵² on how to reduce cell phone radiation exposure. The AAP has long advocated for more protective²⁴⁵ federal regulations and issued ten ways to decrease exposure in 2016²⁵² including "avoid carrying your phone against the body like in a pocket, sock, or bra. Cell phone manufacturers can't guarantee that the amount of radiation you're absorbing will be at a safe level."

“Avoid carrying your phone against the body like in a pocket, sock, or bra. Cell phone manufacturers can’t guarantee that the amount of radiation you’re absorbing will be at a safe level.” American Academy of Pediatrics.²⁵²

In 2017, the California Department of Public Health (CDPH) released an advisory on cell phones.²⁵³ CDPH’s scientists had evaluated the RFR from almost²⁵⁴ two dozen phones and found that when they transmit at their highest power due to use in areas of low service (one or two bars) the emissions can be up to 10,000-fold higher than when the phone is used in areas of strong signal. The CDPH’s advice initially was based on the University of Pittsburgh Cancer Institute’s 2008²⁵³ cell phone radiation reduction advice to doctors and staff, constituting the first ever U.S. medical institution advisory on cell phone radiation.

In 2022, the Maryland State Children’s Environmental Health and Protection Advisory Council²⁵⁵ issued information on how families can reduce wireless and non-ionizing EMF exposures at home and also made recommendations to schools.

A summary of basic recommendations from these organizations and agencies is presented below.

“Avoid carrying your phone against the body like in a pocket, sock, or bra. Cell phone manufacturers can’t guarantee that the amount of radiation you’re absorbing will be at a safe level.” American Academy of Pediatrics.²⁵²

Bluetooth signals are much weaker than cell phones, children and teens keep them in their ears for hours a day and the long term impact has never been independently evaluated.

- Avoid carrying cell phones against the body like in a pocket, sock, or bra.
- Do not talk or text while driving.
- Learn how to switch phone to airplane mode with Bluetooth, Wi-Fi, Hotspot antennas toggled off in settings. Many applications on phones can still be utilized in airplane mode. For example, in order to play movies and music but avoid unnecessary RFR exposure, download the files first, then switch the device to airplane mode and play.
- Keep an eye on your signal strength (i.e. how many bars you have). The weaker your cell signal, the harder your phone has to work and the more radiation it gives off. It’s better to wait until you have a stronger signal before using your device.
- Avoid making calls in cars, elevators, trains, and buses. The cell phone works harder to get a signal through metal, so the power level increases.
- Learn how to connect the cell phone to the internet with ethernet cables.

How families can reduce EMF exposure

Cell phones

- Cell phones are not toys or teething items.
- When parents hold their babies or children in their arms, they should not simultaneously use or hold mobile phones or wireless devices as this will expose the child to RFR.
- Decrease overall time spent on wireless phones and prefer corded phones for long calls.
- Delay purchasing a first cell phone for a child. Cell phones should only be used by children for emergencies.
- Prefer text messaging over voice and video calls.
- Decrease exposure to and through the brain by using cell phones in speaker mode, away from the head and body, or wired airtube headsets with the phone away from the body. Avoid airpods. While

Computer, laptop and tablet internet connections in buildings

- Install internet access via a hardwired ethernet connection instead of Wi-Fi.
- Wi-Fi routers should be distanced from areas where children sleep, play and school.
- At a minimum, power Wi-Fi networks off at bedtime and during periods when not in use.
- Connect computer/laptop/tablet accessories and peripherals such as printers, speakers, keyboard and mouse with cords, rather than Wi-Fi or Bluetooth.

At home

- Replace cordless phones with corded phones. Cordless phones and their base stations emit RFR.

- Avoid wireless digital baby monitors. If necessary, choose wired monitoring systems.
- Remove screens, electronics and wireless devices from the bedroom.
- Turn off devices at night and ensure sleep areas are not against a wall where utility meters are installed on the other side as “smart” meters are sources of RFR and other EMF.

Additional considerations during pregnancy

Simple preventive measures during pregnancy can significantly decrease fetal exposures, especially the high intensity exposures from a wireless device resting directly on the abdomen.

- Distance cell phones and wireless devices away from your abdomen.
- Power off cell phones when carrying them near your body.
- Always use laptops and tablets on a desk, not on your lap or close to your abdomen.
- For voice calls, use corded phones instead of cell phones or cordless phones.
- Use ethernet connections instead of Wi-Fi to connect devices.

Cell tower emission and ambient limits

As shown in Fig. 7 numerous countries such as India, Israel, Greece, China,²⁵⁶ Russia and eastern European countries have RFR limits for cell tower network emissions that are much stricter than the limits of the US/FCC (although there is not always documented reliable monitoring or enforcement in every country). Australia, Japan, Italy and Switzerland have limits for areas such as schools and apartment buildings and areas where people spend several hours a day. Several governments, such as France, Israel, Greece and Switzerland have RFR measurement programs in place along with easy access to the data. For example, in France, the National Frequency Agency ANFR “Observatoire des Ondes”²⁵⁷ posts online the

Several governments, such as France, Israel, Greece and Switzerland have RFR measurement programs in place along with easy access to the data. For example, in France, the National Frequency Agency ANFR “Observatoire des Ondes”²⁵⁷ posts online the RFR measurements taken numerous times a day in various cities.

RFR measurements taken numerous times a day in various major cities. Countries such as Greece and Israel have policies in place that specifically restrict the placement of cell towers near “sensitive areas” defined generally as schools and/or homes and hospitals and provide for online access to real-time radiation levels. Greece further restricts exposure to a stronger limit within 300 m of sensitive areas. Chile’s “Antenna Law”²⁵⁸ has established mitigation measures in areas with dense infrastructure and prohibits towers near “sensitive areas” defined as institutions serving children, the elderly, and the medically compromised. Again, monitoring and enforcement are not reliably determined in many instances.

At the local level, numerous municipalities in the U.S.²⁵⁹ and other countries²⁶⁰ have policies to restrict cell towers on school property and many communities have removed wire-

less antennas from school properties. For example, the Supreme Court of India upheld a decision by the High Court of the State of Rajasthan to remove installations on school properties and playgrounds.²⁶¹

Several countries focus their RFR monitoring and oversight on children’s areas. Brazilian Law nr 11,934 includes regulations²⁶² defining a critical area as the 50-meters-radius around hospitals, clinics, schools, day care centers, and facilities for the elderly. The RFR levels must be assessed within 60 days after the issuance of a license and then regularly re-evaluated. Like France, Brazil hosts an online map²⁶³ with the country’s RFR measurements. Greece’s National Observatory of Electromagnetic Fields²⁶⁴ has 500 sensors providing RFR level monitoring for schools and other sensitive areas. Further measures that are commonly implemented internationally are listed in Table 3.

Regulatory gaps in the U.S

At the federal level in the U.S., policy changes are needed to address numerous regulatory gaps regarding

TABLE 3. International policy to Increase transparency, ensure compliance and reduce cell phone and RF radiation.

Policy	Country examples
Public RFR exposure limits are more stringent than ICNIRP/ FCC limits	Italy, India, Israel, Croatia, Ukraine, Greece, China, Russia, Canada, Switzerland, Belgium, Bosnia Herzegovina, Grand Duchy of Luxembourg, Belarus, Georgia, Serbia, Slovenia, Montenegro, Bulgaria, Turkey, Liechtenstein, Tajikistan, Kazakhstan, Uzbekistan, Kyrgyzstan, Moldova, Kuwait, Republic of Moldova, Iraq
RFR monitoring program for cell tower/base station emission compliance and/or environmental RFR exposures.	France, Greece, Turkey, Spain, Romania, Serbia, India, Israel, French Polynesia, Croatia, Bulgaria, Tunisia, Malta, Brazil, Bahrain, Monaco, Bhutan, Senegal, United Kingdom, Australia, Spain, Austria, India, Israel, Gibraltar, Brussels Belgium, Switzerland, Norway, Lithuania.
Straightforward official government advice that the public and/ or children “should” minimize cell phone RF exposure.	United Kingdom, Russia, Switzerland, Finland, Ireland, Germany, Belgium, Greece, Israel, Turkey, Singapore, France, Denmark, India, Austria, Cyprus, Canada, Italy, French Polynesia - Maryland U.S. for Wi-Fi in Schools (CEHPAC), Korea, Sri Lanka, Croatia, Krakow Poland, European Parliament Resolution 1815
Ban on mobile phone advertising to children	France, Belgium, French Polynesia, Russia
Ban on sale of phones designed for young children	Belgium, France, French Polynesia
SAR labeling on device, packaging or by retailer at point of sale	France, Israel, India, Belgium, Russia, Korea
SAR levels for cell phone models are publicly posted on easily accessible government website	France, Korea, Austria, Senegal, Germany,
Market surveillance program for cell phone SAR compliance	France, Canada
Public awareness program, robust website and/or educational campaign to educate the public on how to minimize RFR exposures from cell phones	France, French Polynesia, Israel, Cyprus, Israel

all aspects of control, monitoring, measuring and remediating wireless radiation.

First, no federal agencies with health or environmental expertise have reviewed the totality of the science to ensure U.S. regulations are adequate. In 2021 the U.S. Circuit Court of Appeals for the District of Columbia issued a landmark ruling in the case of Environmental Health Trust et al. vs. the FCC⁵⁵ that challenged the FCC’s decision not to update the human exposure limits for RFR emissions from cell phones, Wi-Fi, and cell tower networks. The Court found that the FCC did not provide evidence of properly examining scientific evidence on the record and had ignored studies indicating low level non-thermal exposures could cause harm, especially for children. The Court then ordered the FCC to provide a reasoned explanation regarding these issues:

- the impacts of wireless radiation on children;
- the health implications of long-term exposure to RF radiation;
- the ubiquity of wireless devices and the technological developments since the FCC last updated its guidelines;
- the cell phone radiation emission test methods that use heat measurements and allow a space between the phone and body; and

- the impacts of wireless radiation on the environment.

Another critical regulatory gap is that when considering cell tower network emissions, there is no U.S. agency with health or environmental expertise engaged in any funded activities regarding health effects.

Unlike other countries that are gathering data via countrywide monitoring programs, the U.S. has no active federal field measurement program for assessment, compliance, or enforcement regarding cell tower and base station antenna RF emissions. The last federal agency report on RFR measurements was compiled in 1986 by the EPA.²⁶⁵ When companies apply to build a cell tower in the U.S. near a school or homes, there are no requirements for real world RFR measurements before and after the antenna facilities are built, nor any requirement for annual measurements. The computer simulations provided by the company do not always provide estimated RFR levels for all of the areas that will be impacted by the cell antenna installation, such as inside an apartment that shares a wall with a building mounted antenna, or inside the room of a school or home in direct line of sight of the main beam of an antenna. Such close

proximity installations can result in increased RF exposure^{35,266,267} and are associated with various EMF-related symptoms.^{208,210}

Although several nations post online maps with the location of cell towers and wireless facilities alongside RFR measurements, U.S. federal agencies neither collect, nor provide this information to the public. For example, small cell wireless facilities (such as those on poles less than 50 feet tall such as street lamps) generally do not need to be registered with the FCC.

International marketing, compliance and transparency measures

Some countries have enacted a variety of regulations designed to minimize children’s exposure, ensure compliance with cell phone regulations, and ensure that the public has access to RFR information as shown in Table 3. For example, since 2010 France has prohibited the sale of cell phones designed for children under 6 years, and banned advertising cell phones to children under 14 years. In 2015, their cell phone labeling requirements were strengthened. Advertising must clearly recommend how to reduce exposure to the head or companies can be fined. In 2019, a joint order of the French Health and Finance Agencies²⁶⁸ ordered that the cell phone consumer information should include several specific ways to reduce RF exposure to the brain, minimizing frequency and duration of use. In addition, the cell phone information includes “Keep radio equipment away from the belly of pregnant women,” and “away from the lower abdomen of adolescents.”²⁶⁹

2020 regulations²⁷⁰ now mandate that computers, tablets and other handheld wireless electronics (as well as refurbished products) held close to the body were subject to the same labeling regulations as cell phones. In 2022, the French General Directorate for Competition, Consumer Affairs and Fraud Prevention found numerous violations²⁷¹ of their labeling requirements for wireless devices and issued over 200 warnings.

In 2014, Belgium implemented two Royal Decrees²⁷² that prohibited the sale and advertising of cell phones designed for children under 7 years old.²⁷³

Premarket cell phone and wireless device RFR testing

Some countries such as France and Canada perform independent SAR measurements of cell phone models to ensure regulatory compliance. Both countries have found that some phone models exceed their regulatory limits, even when tested at the manufacturer’s stated separation distance, i.e. 5 or 10 or 15 mm from the head or body.

So far, over 35 non-compliant phone models have been either withdrawn from the French market or had software updates to decrease the RFR. The French National Frequency Agency, ANFR, posts their independent SAR test measurements for hundreds of cell phones online.²⁷⁴ The U.S. does not have an oversight program for cell phone RFR emission compliance.

Furthermore, all cell phones and Wi-Fi devices such as routers, speakers, and gaming consoles have fine print instructions in their manuals stating that the user should maintain a specified minimum distance between their body and the phone or device in order to ensure compliance with regulatory safety limits.

Schools and child care settings

France, Israel, and regions in Belgium have removed Wi-Fi from kindergarten classrooms and restricted exposures in elementary classrooms. See Table 4. For example, French law (2015)²⁷⁵ stipulates that Wi-Fi be off as the default setting, so that it is only turned on if needed for a particular classroom activity. The Parliamentary Assembly of the Council of Europe (PACE) Resolution 1815²⁷⁶ (2011) recommends that “for children in general, and particularly in schools and classrooms, give preference to wired Internet connections, and strictly regulate the use of mobile phones by school children on school premises.”

TABLE 4. International examples of policy measures to reduce RFR exposures in schools and child care settings.

Recommendations to prefer wired over Wi-Fi in kindergartens and schools	France, Israel, Germany, French Polynesia, Salzburg Austria, Maryland U.S.
Wi-Fi banned in child care settings and kindergarten	France, Israel, Ghent Belgium, French Polynesia, Cyprus
Wi-Fi off or minimized in elementary	France, Israel, Cyprus, Various municipal school districts worldwide

In the U.S., there are no specific school-focused or workplace-based federal regulations for RFR exposures. The Maryland State Children's Environmental Health and Protection Advisory Council report on Wi-Fi in school²⁷⁷ recommends the reduction of RFR exposures in schools "as much as feasibly practical." Clegg et al.²⁷⁸ outlines how to minimize RFR in buildings and includes the Collaborative for High Performance Schools²⁷⁹ criteria to reduce RFR and ELF EMF in classrooms. (See a summary of recommendations below.)

Recommendations by Maryland Expert Advisors to the Governor and the Collaborative For High Performance Schools include:

- Install and use wired local area network (LAN) for internet access instead of Wi-Fi and connect classroom tech with cables whenever possible and always when building/remodeling.
- Ensure devices (tablets and laptops) are always used on a desk, not lap.
- Laptops, tablets and notebooks should have an Ethernet port and a physical switch to disable all wireless radios at once.
- Cell phones should be powered off and stored away during the school day. Wireless wearables should be turned to airplane mode.
- Prohibit use of DECT and cordless phones.
- Corded telephones should be installed in every classroom and there should be a way that students can contact parents and make calls during the day for planning purposes.
- Schools should integrate education on why and how to reduce RFR exposure into elementary, middle and high school class curriculum.
- Cell towers and wireless facilities should not be built on or adjacent/near to school property.
- Measure ELF and RFR levels in classrooms and sports areas yearly and when new technology is added to classrooms.

Healthcare settings

Sources of non-ionizing EMF exposure inside hospitals and healthcare facilities come from both the wireless networks (RFR) as well as electrical medical equipment (ELF-EMF).

EMF levels in neonatal units have been the subject of research due to the elevated exposure to an

especially vulnerable patient group. Measurements of ELF inside incubators can range from 2 to 100 mG, depending on the distance from the top of the mattress to the electrical equipment.²⁸⁰ After documenting higher levels of low frequency EMF levels inside closed incubators as compared to the ambient levels in the room, Penn State Medical Center researchers moderated the exposure through a grounding technique and found the mitigation improved infant's vagal tone, a marker of vulnerability to stress, and the risk of developing necrotizing enterocolitis.²⁸¹

RFR in neonatal intensive care units primarily originates from staff and families' use of cell phones and wireless devices. A prudent avoidance strategy is recommended because these newborns are particularly vulnerable.²⁸²

In 2017, in Israel measurements of magnetic field EMF were taken for incubators in neonatal units at the request of the Ministry of Health and the Ministry of Environmental Protection²⁸³ and they found a range from 0.05 to 5 μ T. The Israel Ministry of Environmental Protection identified manufacturer approved efficient shielding methods to mitigate exposure in incubators and recommends reducing the duration of exposure as much as possible and prioritizing the use of low EMF incubators.

In Cyprus, the National Committee on Environment and Children's Health, under the auspices of the Ministry of Health, worked with the Archbishop Makarios III Hospital to pilot an RFR reduction program²⁸⁴ in the pediatric intensive therapy unit and neonatal units. They removed the Wi-Fi access points, installed wired LAN networks and launched a multimedia educational program for families. RFR levels were measured before and after the mitigation and the measures resulted in a significant reduction in ambient exposure in the units.

The Agaplesion Diakonie Hospital in Hamburg, Germany has designed two "environmental" rooms for people with multiple chemical sensitivities and/or environmental allergies including sensitivity to electromagnetic fields. In addition to using low VOC emission building materials and fragrance free cleaning, several measures have been taken to reduce exposure to non-ionizing electromagnetic fields including the installation of power circuit breakers and prohibition of the use of cell phones.²⁸⁵

Recommendations for healthcare settings to minimize exposures, to support positive health outcomes as well as to accommodate patients with sensitivities:^{13,83,197,199,215,275,281}

- Decrease RFR exposures in pediatric healthcare settings including waiting rooms, treatment areas, hospital rooms, and administrative workspaces by prioritizing wired connections and setting routers to their lowest operating settings;
- Ensure facilities have spaces with adequate EMF mitigation for treatment of sensitive patients;
- Educate patients, families, and staff;
- Utilize medical devices, equipment and technology designed without wireless features, or configured such that wireless connections are not essential and can be turned off when not in use; and
- Work with companies on research and design of safer technologies.

Conclusion: next steps for clinicians to better protect the young from impacts of RFR

Modern telecommunications have been embraced for their innumerable benefits to society, but we have been slower to acknowledge the need to avoid and reduce harms to youngsters or to the natural world on which our lives depend.²⁸⁶ Fortunately, alternatives to employing wireless devices can provide safer, faster and more efficient technical performance for many modern applications. There are many distinct physical, psychological and sociological grounds for moderating children's screen time to promote healthy development. The principle of ALARA—as low as reasonably achievable—ought to be adopted as a strategy for RFR health and safety protection.

While such measures are being implemented in clinicians' offices, clinics and the like, there is a critical need for an independently funded training, research and monitoring program to identify major data gaps in the field which are substantial, to set relative priorities for research and training, and to conduct long term studies of the physical and psychological impacts of rapidly changing technological milieu, including ways to mitigate impacts through modifications in hardware and software.

The medical community has a critical role to play in the prevention and treatment of EMF associated illness. Steps that doctors and other healthcare professionals can take include:

- Federal level: Advocate with the AAP and other health professionals for a reassessment of RFR

exposure limits and the development of standards that adequately address biological impacts, children's vulnerabilities and current use patterns.

- State level: Engage membership with educational and training activities as well as resolutions to support federal initiatives.
- Support policies that reduce EMF exposure for children in home, child care, school, health care, and recreational settings.
- Support the continued development of clinical guidelines for prevention, treatment and diagnosis of EMF related illness.

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Supplemental Materials For Wireless Technologies, Non-ionizing Electromagnetic Fields and Children: Reducing Health Risks

- I. Recommendations to reduce RF radiation
 1. Medical Organizations
 2. Public Health Organizations and Entities
 3. Schools and Buildings
 4. New Hampshire State Report on 5G Health and Environment
 5. Scientific Appeals

II. Examples of Fine Print Warnings

III. Resources on Reducing Exposure To Share

Recommendations to reduce RF radiation

1. Medical Organizations

American Academy of Pediatrics (AAP)

AAP Cell phone safety tips for families (2016)

- Prefer texting to voice calls
- Use cell phones in speaker mode or hands-free to distance the cell phone away from the head.
- Make only short or essential calls on cell phones.
- Avoid carrying your phone against the body like in a pocket, sock, or bra.
- Do not talk on the phone or text while driving.
- If you plan to watch a movie on your device, download it first, then switch to airplane mode while you watch in order to avoid unnecessary radiation exposure.
- Minimize use in areas of low signal (i.e. how many bars you have). The weaker your cell signal, the harder your phone has to work and the more radiation it gives off.
- Avoid making calls in cars, elevators, trains, and buses. The cell phone works harder to get a signal through metal, so the power level increases.
- Remember that cell phones are not toys or teething items.

American Academy of Pediatrics Letters

- [AAP Letter to the FCC Chairman calling for the FCC to open up a review of RF guidelines \(7/12/2012\)](#)
- [AAP Letter to US Representative Dennis Kucinich in Support of the Cell Phone Right to Know Act 12/12/2012](#)
- [AAP to FCC Commissioner Mignon Clyburn and FDA Commissioner Margaret Hamburg calling for a review of RF guidelines 8/29/2013](#)

Santa Clara California Medical Association

Santa Clara California Medical Association Bulletin Articles on EMF

- [Wireless Silent Spring](#)
- [Wi-Fi in School: Are We Playing it Safe With Our Kids](#)
- [Shallow Minds: How the Internet and Wi-Fi in Schools Can Affect Learning](#)
- [A 5G Wireless Future: Will it Give Us a Smart Future](#)
- [Autism Rising Environmental Factors Part 1.](#)
- [Autism Rising Environmental Factors Part 2](#)
- [Saving Your Landline May Save Your Life](#)
- [What's the Diagnosis Doctor? Electromagnetic Sensitivity](#)

California Medical Association

In 2014, the California Medical Association passed two resolutions regarding wireless standards: 1. To “support efforts to reevaluate microwave safety exposure levels associated with wireless communication devices, including consideration of adverse non-thermal biologic and health effects from non-ionizing electromagnetic radiation used in wireless communications”; and 2. To “support efforts to implement new safety exposure limits for wireless devices to levels that do not cause human or environmental harm based on scientific research.”

Massachusetts Medical Association

In 2021, the Massachusetts Medical Association passed [a policy statement](#) in support of “continuing research, including quality epidemiologic studies, by appropriate agencies and entities to produce evidence-based data on the effect(s) of radio frequency radiation on human health. If indicated, study findings should be used to revise and update public health standards for safe limits of human exposure to radio frequency radiation.”

Austrian Medical Chamber, Cyprus Committee on Environment and Children's Health

[The 16 Practical Rules to Reduce Cell Phone and Wireless Radiation](#)

Athens Medical Association

[16 Recommendations to reduce human exposure to wireless radiation \(2017\)](#)

TIPS TO REDUCE YOUR WIRELESS RADIATION EXPOSURE

WHERE & WHEN

Keep a distance. Avoid holding your cell phone or cordless phone near your head or body during phone calls. Don't carry your cell phone in your pocket, in your bra, or close to your body when it is powered on. Especially keep the phone away from your head and reproductive organs. Use speakerphone, text, or wired headset. Avoid talking longer than necessary.

Wait for a good signal. When the signal is poor, your wireless devices emit more radiation so avoid use when surrounded by metal such as in an elevator, or while travelling in automobiles, buses, trains or aircraft.

Reduce secondhand exposure. Reduce the time you spend in locations where many people are using cell phones in close proximity to each another, especially on public transit.

Turn off wireless devices at bedtime. Turn off your cell phone, Wi-Fi router, and other wireless devices at bedtime and at other times when not in use.

WHO & HOW

Minimize children's use & exposure to wireless radiation. Children's health risks are greater so limit their use of cell phones and other wireless devices. Turn off Wi-Fi and cellular on devices used by kids. Teach children to use wireless technology safely.

Pregnancy & fertility. If you are pregnant or planning for a baby be especially careful as wireless radiation exposure is linked to reproductive health effects and also to sperm damage. Do not use a wireless tablet or laptop in your lap.

Use airplane mode. Turn off cell phones and other wireless devices when not in use or switch to Airplane Mode. Turn off Wi-Fi and Bluetooth when not in use.

Use wired connections. Use a wired, land line phone whenever possible. Forward cell phone calls to your land line and check on them when you get home. Use wired Internet connections.

TAKE ACTION

Electromagnetic hypersensitivity. If you think you are developing allergic symptoms from wireless radiation exposure, keep a log of your exposures and your symptoms. Then reduce your exposures for two weeks, and see if your symptoms are reduced. Discuss the results with your healthcare provider.

Governmental action is essential. Send the *International EMF Scientist Appeal* (EMFscientist.org) to your elected representatives. Ask them to adopt policies to make wireless technology safer. Encourage them to fund education and research through a modest fee on mobile device subscriptions (e.g. a nickel a month). Work with others to get schools to remove Wi-Fi and provide students with Internet access via wired networks.

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Electromagnetic Radiation Safety
Website: <http://www.saferemr.com>
Facebook: <http://www.facebook.com/SaferEMR>
News Releases: <http://pressroom.prlog.org/jmm716/>
Twitter: @berkeleyprc



Maryland Children's Environmental Health and Protection Advisory Council

Guidelines to Reduce Electromagnetic Field Radiation

December 2022

Introduction

The Maryland Children's Environmental Health and Protection Advisory Council (CEHPAC) identifies environmental health issues that impact children and seeks to protect them from exposure to environmental hazards. Under Md. Code Ann., Health-General §13-1506, CEHPAC is directed to:

(4) Gather and disseminate information to the public, including the research and medical communities, community-based organizations, schools, and State agencies, on how to reduce, treat, and eliminate children's exposures to environmental hazards to further the public's understanding of the environmental hazards that may potentially affect children; and

(5) Recommend uniform guidelines for State agencies to follow to help reduce and eliminate children's exposure to environmental hazards, especially in areas reasonably accessible to children...

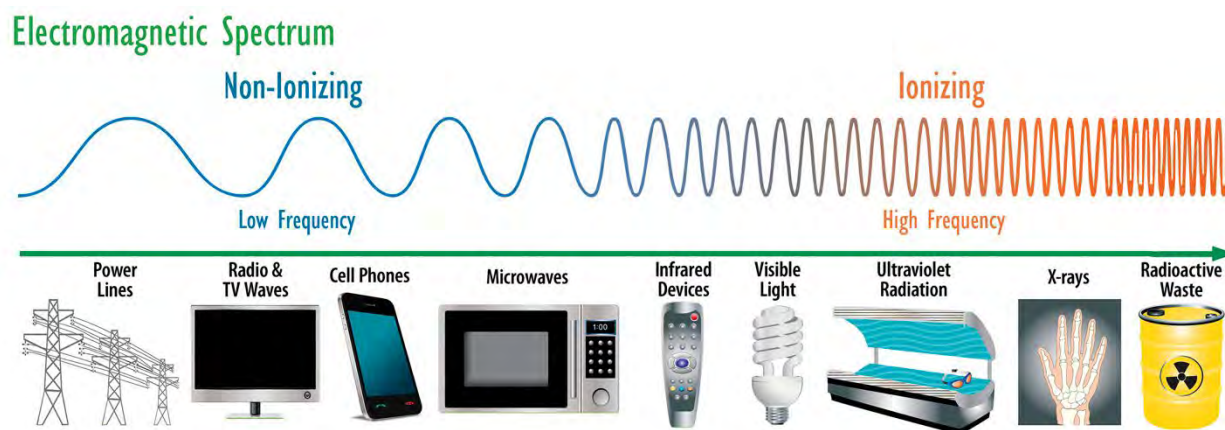


Figure 1. Source: [National Institute of Environmental Health Sciences](#)

In 2016, CEHPAC adopted a report on [WiFi Radiation in Schools in Maryland](#) to examine questions related to potential health outcomes linked to exposures associated with WiFi technology. This report expands on that work by compiling information on how families can reduce their daily exposure to non-ionizing electromagnetic fields. If you are interested in a more detailed analysis and policy recommendations please see the [2016 WiFi Radiation in Schools in Maryland Final Report](#).

What are electromagnetic fields?

“Electromagnetic fields are a combination of invisible electric and magnetic fields of force. They are generated by natural phenomena like the Earth’s magnetic field but also by human activities, mainly through the use of electricity. Mobile phones, power lines and computer screens are examples of equipment that generates electromagnetic fields.” - [European Commission’s Directorate General for Health & Food Safety](#)

How do wireless devices work?

Cell phones and wireless devices use a type of non-ionizing electromagnetic field called radiofrequency radiation to transmit information.

“Radiofrequency (RF) energy is a type of electromagnetic radiation. It is used to transmit signals carrying information in the form of radio waves. Radio waves are broadcast using a transmitter. When the radio waves reach a receiver, the signal is converted back into the information that was originally sent by the transmitter. When you talk on a cell phone, your cell phone acts as a transmitter and your voice is carried on radio waves to the person you are calling. Their phone acts as the receiver and converts the signal back into your voice. In addition to cell phones, other wireless devices such as radios, Wifi routers, satellites, radars and pacemakers can send or receive RF energy waves.” - [US EPA’s RadTown](#)

Are there health concerns about exposure to RF energy from cell phones and wireless technologies?

For a more detailed analysis, please see the [2016 WiFi Radiation in Schools in Maryland Final Report](#), which examined the current evidence linking radiofrequency radiation to health outcomes, including cancer. While the science is still evolving, there are broad concerns about exposure to RF radiation.

According to the [California Department of Public Health](#), “...some laboratory experiments and human health studies have suggested the possibility that long-term, high use of cell phones may be linked to certain types of cancer and other health effects, including:

- brain cancer and tumors of the acoustic nerve (needed for hearing and maintaining balance) and salivary glands,
- lower sperm counts and inactive or less mobile sperm,
- headaches, and
- effects on learning and memory, hearing, behavior, and sleep”

There are no definitive studies establishing a causal link in humans, and scientists disagree about whether cell phones cause these health problems and how great the risks might be.

Children may be at greater risk than adults from exposure to RF energy. Their bodies and brains are still developing and are more vulnerable to exposures that could cause harm. Because their skulls are thinner and their heads are smaller than those of adults, children have a relatively greater risk of exposure to the RF energy of cell phones. Children also will accumulate many more years of cell phone and wireless exposure than adults. Animal research has also shown the potential for health effects of RF radiation to a developing fetus.

In 2011, the International Agency for Research on Cancer (IARC) [classified](#) wireless radiofrequency radiation as a Class 2B possible carcinogen based on research that found long term cell phone use associated with a form of brain cancer.

The [2016 WiFi Radiation in Schools in Maryland Final Report](#) recommended “...limiting exposures as much as feasibly practical, without negatively impacting education.” The Department of Connecticut Department of Health takes this a step further and states, “It is wise to reduce children's exposure.”

Sources of Children’s Exposure to Wireless Radiofrequency Radiation

Common sources of radiofrequency radiation exposure to children include:

- Cell phones
- Cordless phones and their base station
- Tablets, laptops, and computers
- WiFi routers and hotspots
- Wireless video game consoles/handsets
- Wireless Baby monitors
- Signal boosters
- Wireless headphones, printers, speakers, keyboard, mouse
- Wearable wireless tech including “smart” watches and fitness wristbands
- Wireless “smart” appliances
- Wireless utility meters
- WiFi or Bluetooth toys

The Basics of Reducing RF Exposure

Increase Your Distance

The closer you are to a cell phone or wireless device, the higher the exposure to your brain and body. The further away you are, the lower the radiation your body absorbs. Notice how close children are to you when you are using a cell phone or wireless device, and minimize their exposure. For example, do not rest a cell phone on your baby or hold a transmitting device near their bodies.

Minimize Time on Wireless

A child's daily exposure adds up over time. Every time you reduce your child's exposure, even in small ways, you can decrease the overall cumulative exposure to mitigate risk.

Choose Safer Technology Solutions

As consumers, parents and caregivers have safer options when it comes to connecting to the internet or choosing which electronics to purchase. Once you are aware of this issue, you can make low RF radiation choices and choose corded connections whenever possible. Take a look at what you have in your home and swap wireless devices with corded connections if possible. For example, use a corded keyboard or earbuds with a wire.

Recommendations to Reduce Cell Phone and Wireless Device Radiation Exposure

Cell phones, wireless devices, and WiFi routers emit RF radiation all the time, even when you are not using them. Even in standby mode, your phone emits RF radiation because it is constantly searching for service or new messages. If you do not need your cell phone, simply turn it off or put it in airplane mode. This applies to all other wireless devices, including laptops, tablets, video gaming consoles and smart speakers. Additional recommendations are provided below as general guidelines.

Around the Home¹

- Replace cordless phones with corded home phones.
- Unplug cordless phones when not in use (if you have at least one corded telephone in the house, you can always be reached, even if the cordless phone is off at night).
- Remove electronics from the bedroom and especially around your bed and the crib.
- Avoid sleeping with electric blankets and heating pads; if you use an electric blanket to preheat your bed, unplug it before sleeping. If you only turn it off, the electromagnetic field will still be present.
- Do not stand close to a microwave oven when it is on or let your child press their face up to it watching the food cook.

Cell Phones

- Try to keep devices, especially cell phones, away from the head and body. Keeping them an arm's distance away significantly reduces exposure.²
- When you are talking on a cell phone, use the speakerphone to reduce exposure to your head.²
- Avoid carrying your phone against the body like in a pocket, sock, bra, or spandex pants. Cell phone manufacturers cannot guarantee that the amount of radiation you are absorbing will be at a safe level.²
- Make only short or essential calls on cell phones so that you minimize your daily exposure.²
- Use text messaging rather than voice calls when possible.²

Laptops and Computers

- Choose wired Internet (ethernet cable modems) at home instead of wireless systems, if possible.³
- Place WiFi routers as far away from children as possible.³
- Consider using a switch to shut down your wireless router when it is not in use.³

¹ These recommendations are based on a [Fact Sheet by the Collaborative on Health & the Environment](#).

² These recommendations come from the [American Academy of Pediatrics](#) (AAP).

³ Based on the [California Department of Health review](#).

- Instead of laps, place electronic devices, tablets, and laptops on desks and tables which can serve to increase the distance between the device and children's bodies.³

Turn Wireless Antennas Off

- Airplane mode is a setting that turns transmitting antennas off in wireless devices.
- If you plan to watch a movie on your device, download it first, then switch to airplane mode while you watch to avoid unnecessary radiation exposure.²
- Teach children to turn off WiFi when not in use, especially if they are sleeping (also see bedroom suggestions below).³
- Newer phone models turn most of the wireless antennas off with Airplane mode, but Bluetooth or WiFi may stay on, so check that all antennas are set to off such as 4G, 5G, Bluetooth, WiFi hotspot, location.

Learn About When Your Cell Phone Goes to Highest Exposure

Reduce or avoid use of cell phones and wireless technologies when the devices are going to maximum power, which means the device will result in higher radiation exposures.^{2,3}

- *You are in an area of low signal:* Keep an eye on your signal strength (i.e. how many bars you have). The weaker your cell signal, the harder your phone has to work and the more radiation it emits. It is better to wait until you have a stronger signal before using your device.
- *You are traveling in a car or vehicle:* Avoid making calls in cars, elevators, trains, and buses. The cell phone works harder to get a signal through metal, so the power level increases. When vehicles are traveling, the device also increase power to switch connection to each cell tower the vehicle passes.
- *You are streaming video and large files:* The more streaming data, the higher the radiation exposure.

Helpful Tips

- If your tablet or laptop does not have an ethernet port you can get a special adapter that allows you use ethernet with thunderbolt or USB ports.
- Many cell phones can also be plugged into ethernet port with an adapter made for cell phones.
- Use wired peripherals and accessories (e.g. a wired mouse, wired speakers, and wired printers) rather than wireless.
- Wireless virtual assistants emit RF so choose wired tech whenever possible.
- Wireless gaming consoles emit RF even when not in use so keep these out of the bedroom and choose wired handsets.

In the Bedroom

- Cell phones should be powered off at night.²

- If your child or teen needs an alarm clock, get a battery powered alarm clock for the bedroom.²
- If they must use a cell phone for an alarm clock, teach them to turn the phone to airplane mode with wireless antennas off every night (the alarm will still work).²
- Do not charge a cell phone or wireless devices near your child's bed. Charging creates higher electromagnetic fields even if you are not using the device.
- Children should not sleep with their head near a wall that has the electric panel, electric meter, or appliance on the other side.

Read the Fine Print

Read the “fine print” from the manufacturer’s instruction manual which may tell users to keep a distance between the phone and your head and body. These fine print warnings range from a few millimeters to almost an inch. The fine print warnings on other wireless devices such as WiFi routers, home cordless phone base stations, and baby monitors generally state devices should be at 20 cm, or about 8 inches. If people are closer than the manufacturer-stated separation distance, then they can be exposed to RF levels that violate the US government FCC limits for this type of radiation.

Beware Radiation Protection Devices

Do not rely on a “radiation shield” or other products claiming to block RF energy, electromagnetic fields, or radiation from cell phones. According to the U.S. Federal Trade Commission, products that interfere with the phone’s signal may force it to work harder and emit more RF energy to stay connected, possibly increasing your exposure. There are no standard protocols for testing and comparing devices to ensure they work. It is best to use wired corded electronics to reduce RF radiation rather than rely on an untested product.³

If You are Pregnant

Findings on prenatal impacts have led doctors to sign onto an [EPA-recognized](#) educational campaign called [The BabySafe Project](#)*urging pregnant women to reduce wireless exposure to minimize risks to their babies’ brain development. They recommend many of the same things listed above, including:

- Keep your cell phone away from your body. Never carry it in a pocket or bra.
- Do not sleep with your phone. Switch your phone to airplane mode whenever you are not using it.
- Keep your wireless laptop or tablet away from your body. Never rest your wireless device on your tummy.
- Use a corded landline if at all possible, rather your cell phone or cordless phone.
- Don't sit anywhere close to your router or smart meter. Turn off routers at night.
- Whenever possible, connect to the internet using wired (ethernet) connections.

*The BabySafe Project is a joint initiative of Environmental Health Trust and Grassroots Environmental Education.

Scientific Appeals

Scientists have organized [numerous appeals](#) highlighting the existence of non thermal biological effects and the need for new policies to reduce exposure.

The [International Scientists Appeal to U.N. to Protect Humans and Wildlife from Electromagnetic Fields and Wireless Technology](#) was started in 2015. As of November 2022, 257 scientists from 44 nations and 15 supporting scientists from 11 nations have signed this appeal requesting: which has nine collective requests:

1. Children and pregnant women be protected;
2. Guidelines and regulatory standards be strengthened;
3. Manufacturers be encouraged to develop safer technology;
4. Utilities responsible for the generation, transmission, distribution, and monitoring of electricity maintain adequate power quality and ensure proper electrical wiring to minimize harmful ground current;
5. The public be fully informed about the potential health risks from electromagnetic energy and taught harm reduction strategies;
6. Medical professionals be educated about the biological effects of electromagnetic energy and be provided training on treatment of patients with electromagnetic sensitivity;
7. Governments fund training and research on electromagnetic fields and health that is independent of industry and mandate industry cooperation with researchers;
8. Media disclose experts' financial relationships with industry when citing their opinions regarding health and safety aspects of EMF-emitting technologies; and
9. Safe zones (radiation-free areas) be established.

There have been many appeals over the years such as the [Reykjavik Iceland Appeal on Wireless in School](#) (2017), the [Scientist 5G Appeal to the EU](#)(2017) , the [Nicosia Declaration](#) (2017), the [International Society of Doctors for Environment 5G Appeal](#) (2018) and the [2020 Consensus Statement of UK and International Medical and Scientific Experts and Practitioners on Health Effects of Non-Ionising Radiation](#).

How to Reduce Exposure to Radiofrequency Energy from Cell Phones



The use of cell phones has increased dramatically in recent years, including among children and young adults. These phones put out radio frequency (RF) energy.

Some scientists and public health officials believe RF energy may affect human health. This guidance document describes RF energy, lists some of the potential health concerns, and provides guidance on how people can reduce their exposure.

Why are people concerned about exposure to RF energy from cell phones?

Although the science is still evolving, some laboratory experiments and human health studies have suggested the possibility that long-term, high use of cell phones may be linked to certain types of cancer and other health effects, including:

- brain cancer and tumors of the acoustic nerve (needed for hearing and maintaining balance) and salivary glands
- lowers sperm counts and inactive or less mobile sperm
- headaches and effects on learning and memory, hearing, behavior, and sleep

These studies do not establish the link definitely, however, and scientists disagree about whether cell phones cause these health problems and how great the risks might be. This document is intended to provide guidance for those people who want to reduce their own and their families' exposures to RF energy from cell phones, despite this uncertainty.

What is RF energy?

Cell phones work by sending and receiving signals to and from cell phone towers. These signals are a form of electromagnetic radiation called radiofrequency (RF) energy. Other sources of RF energy include cell phone towers, TV and radio transmitters, smart meters, and microwave ovens. When a phone sends signals to a tower, the RF energy goes from the phone's antenna out in all directions, including into the head and body of the person using the phone. Cell phones also emit RF energy when using Wi-Fi and/or Bluetooth, but at lower levels.

RF energy is not as powerful or as damaging to cells or DNA as some other kinds of electromagnetic radiation, such as X-rays or UV rays from the sun. Some scientific studies have, however, suggested that there may be increased health risks from exposure to RF energy.

How can you reduce your exposure?

Keep your phone away from your body. Keeping your phone just a few feet away from you can make a big difference.

- ***When you talk on your cell phone, avoid holding it to your head—use the speakerphone or a headset instead.*** Wireless (Bluetooth) and wired headsets emit much less RF energy than cell phones.
- ***Send text messages instead of talking on the phone.***
- ***If you are streaming or if you are downloading or sending large files, try to keep the phone away from your head and body.***
- ***Carry your cell phone in a backpack, briefcase, or purse; NOT in a pocket, bra or belt holster.*** Because your phone's antenna tries to stay connected with a cell tower whenever it's on, it emits some RF energy even when you are not using it. It does not emit RF energy when it's in airplane mode. (Airplane mode turns off cellular, Wi-Fi, and Bluetooth.)

Reduce or avoid using your cell phone when it is sending out high levels of RF energy. This happens mainly when:

- ***You see only one or two bars displayed.*** Cell phones put out more RF energy to connect with cell towers when the signal is weak. If you must use your phone when the signal is weak, try to follow the other guidance on this page.
- ***You are in a fast-moving car, bus, or train.*** Your phone puts out more RF energy to maintain connections to avoid dropping calls as it switches connections from one cell tower to the next unless it is in airplane mode.
- ***You are streaming audio or video, or downloading or sending large files.*** To watch movies or listen to playlists on your phone, download them first, then switch to airplane mode while you watch or listen.

Don't sleep with your phone in your bed or near your head. Unless the phone is off or in airplane mode, keep it at least a few feet away from your bed.

Take off the headset when you're not on a call. Headsets release small amounts of RF energy even when you are not using your phone.



What about children?

Children may be more at risk for harm from exposure to RF energy because:

- RF energy can reach a larger area of a child's brain than an adult's brain.
- A child's brain and body grow and develop through the teen years. During this time, the body may be more easily affected by RF energy and the effect may be more harmful and longer lasting.
- A child who uses a cell phone will have many more years of exposure to RF energy in his or her lifetime than someone who started using a cell phone as an adult.

There is not a lot of research about the effects of cell phone RF energy on children or teenagers, but a few studies have shown that there may be hearing loss or ringing in the ears, headaches, and decreased general well-being.



NEW HAMPSHIRE STATE COMMISSION

2020 REPORT: 5G HEALTH AND ENVIRONMENT

In 2020, the [New Hampshire State Commission issued a Final Report](#) with 15 recommendations to “to protect people, wildlife, and the environment from harmful levels of radiation” after a year-long investigation with numerous meetings and expert testimony.



"A likely explanation as to why regulatory agencies have opted to ignore the body of scientific evidence demonstrating the negative impact of cellphone radiation is that those agencies are “captured.”"

Recommendations To Update RF Exposure Regulations With New Science

- A resolution to US Congress to require the FCC to commission an independent health study and review of safety limits.
- New measurement protocols needed to evaluate high data rate, signal characteristics associated with biological effects and summative effects of multiple radiation sources.

Recommendations To Address Impacts to Wildlife And Environment

- Engage agencies with ecological knowledge to develop RF-radiation safety limits that will protect the trees, plants, birds, insects, and pollinators.
- Under the National Environmental Policy Act, FCC should do an environmental impact statement as to the effect on New Hampshire and the country as a whole from 5G and the expansion of RF wireless technologies.

Recommendations To Reduce Public Exposure

- Require setbacks for new wireless antennas from residences, businesses, and schools.
- Cell phones and wireless devices should be equipped with updated software that stops cell phones from radiating when positioned against the body.
- Establish RF-radiation free zones in commercial and public buildings
- New Hampshire health agencies should educate the public on minimizing RF exposure with public service announcements on radio, television, print.

Recommendations To Utilize Safer Alternatives

- New Hampshire schools and libraries should replace Wi-Fi with hardwired connections.
- Support statewide deployment of fiber optic cable connectivity with wired connections inside homes.

Recommendations To Increase Transparency

- State should measure RFR and post maps with RF measurements..
- Require 5G structures to be labeled for RFR at eye level and readable from nine feet away.
- RFR signal strength measurements for cell sites should be done by independent contractors.
- NH professional licensure to offer RF measurement education for home inspectors.
- Warning signs posted in commercial and public buildings.

Schools and Buildings

<p>Collaborative for High Performance Schools</p>	<p>Low EMF Best Practices Summary</p> <ul style="list-style-type: none"> • Evaluate for common wiring errors, correct them and ensure compliance with National and state electrical codes. • Measure magnetic field levels to ensure compliance with 1 mG in new construction and 2 mG in existing. • Ensure devices (tablets laptops) are used on a desk. Operation on the lap or body is prohibited. • Workstation equipment must be at least 2 feet away • Computers and devices are TCO-certified or lab tested to meet TCO Criteria "Mandate A.4.2" for EMF emissions. • Laptops or notebooks must have an Ethernet port and a physical switch to disable all wireless radios at once and an adaptor with a 3-pin plug. • Install and use wired local area network (LAN) for internet access instead of Wi-Fi. • Prohibit use of DECT and cordless phones (2.4 GHz and 5.8 GHz) unless they have been lab tested to demonstrate that they do not emit in standby mode.
<p>Building science and radiofrequency radiation: What makes smart and healthy buildings Clegg et al. 2020</p>	<ul style="list-style-type: none"> • Consider alternative approaches to wireless technology. Recommendations include: • Neighborhood infrastructure with cable access for high-speed, wired telephone and Internet; • Within buildings use cables, preferably shielded, in Local Area Networks (LAN) to provide wired access points for all networking and data transmission, including wired connections for modems, routers, Internet and media; lighting, heating, ventilation, air conditioning (HVAC), thermostats and humidistats; surveillance and security systems; fire detection and response (e.g., sprinklers); pool equipment such as pump and treatment controls, etc.; • Install easily accessible wired (not cordless) phones and prohibit installation and use of cordless phones; • Throughout the building, provide connections to hardwired CAT6 or CAT7 Ethernet cables, preferably shielded, to service devices such as computers, tablets and other devices. Use wired peripherals and accessories. Ensure that all wireless features are turned off or disabled; • Install wired RJ11 phone jacks for corded and landline telephones; and • Use analog, non-transmitting utility (water, electricity, gas) meter options, that do not transmit data wirelessly.

Examples of Fine Print Warnings for Cell Phones and Wi-Fi Devices

All cell phones and Wi-Fi devices like routers, speakers, and gaming consoles have fine print instructions in their manuals stating that the user should maintain a specified minimum distance between their body and the phone or device in order to ensure compliance with regulatory safety limits.

[LG G8](#)

"Body-worn Operation: This device was tested for typical use with the back of the device kept 0.39 inches (1.0 cm) from the body. To comply with FCC RF exposure requirements, a minimum separation distance of 0.39 inches (1.0 cm) must be maintained between the user's body and the back of the device."

[Apple iPad IOS4](#)

"To be sure that human exposure to RF energy does not exceed the FCC, IC, and European Union guidelines, always follow these instructions...Orient the device in portrait mode with the Home button at the bottom of the display, or in landscape mode with the cellular antenna away from your body or other objects."

[Playstation 4 Pro](#)

"This equipment should be installed and operated with at least 20 cm (8 inches) or more between the radiator and the person's body."

[Amazon Echo Dot \(4th Generation\) Kids Edition](#)

"...it is advised to use the Products in such a manner that minimizes the potential for human contact during normal operation...This Device should be installed and operated with at least 20 cm between the radiator and your body."

[OC1A Owlet Baby Monitor Camera](#)

"This equipment complies with FCC radiation exposure limits set forth for an uncontrolled environment. This equipment should be installed and operated with minimum distance 20 cm between the radiator and your body."

[Samsung Galaxy Z Fold 3 5G](#) (2021)

"Body-worn SAR testing has been carried out at a separation distance of 1.5 cm. To meet RF exposure guidelines during body-worn operation, the device should be positioned at least this distance away from the body."

When cellphones are tested in body contact positions, (i.e. closer than the instructions recommend), the way most children and teenagers use phones today, some cell phone models have been found to [violate allowable levels](#) up to 11 times the U.S. regulatory limits. However, most parents are unaware of these manufacturers' instructions.

Are You Pregnant?

Protect Your Baby from Wireless Radiation!



Recent studies from Yale University show that exposure to wireless radiation can have profound effects on brain development, including symptoms of Attention Deficit/Hyperactivity Disorder (ADHD).

Now, doctors and researchers around the world are urging pregnant women to take simple steps to limit their exposure to wireless radiation.

For more information, including links to scientific studies and video interviews with medical doctors and public health experts, please visit our web site, **BabySafeProject.org**.

10 Tips for Reducing Your Exposure to Wireless Radiation

1. Avoid carrying your cell phone on your body (e.g. in a pocket or bra).
2. Avoid holding any wireless device against your body when in use.
3. Use your cell phone on speaker setting or with an “air tube” headset.
4. Avoid using your wireless device in cars, trains or elevators.
5. Avoid cordless phones, especially where you sleep.
6. Whenever possible, connect to the internet with wired cables.
7. When using Wi-Fi, connect only to download, then disconnect and disable Wi-Fi.
8. Avoid prolonged or direct exposure to Wi-Fi routers.
9. Unplug your home Wi-Fi router when not in use (e.g. at bedtime).
10. Sleep as far away from wireless utility meters (i.e. “smart” meters) as possible



The BabySafe Project
www.BabySafeProject.org
#KnowYourExposure

What's Your
Exposure?
Take the Quiz!



Ways to **REDUCE** Cell Phone Radiation

Here are some examples of recommendations made by the American Academy of Pediatrics, the Vienna Medical Association, and the Cyprus Medical Association.

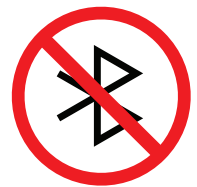


AIRPLANE MODE

Learn how to set your phone to Airplane Mode with antennas OFF. Airplane Mode turns off most of the wireless antennas.

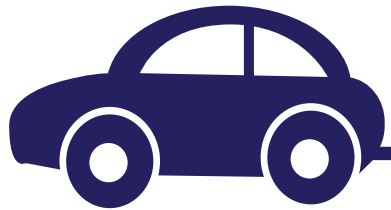
ANTENNAS OFF

Also be sure the Wi-Fi, Bluetooth, and Mobile Data antennas are OFF in the phone settings. Even with antennas off, you still can play music, take photos, and make videos.



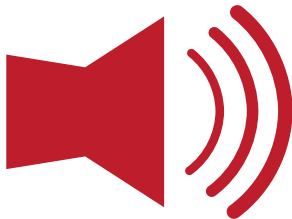
AVOID MAKING CALLS IN CARS

The cell phone works harder to get a signal through metal, so the radiation is stronger.



TEXT INSTEAD OF TALK

Remember to hold the phone away from your body. Pics and video increase radiation.



SPEAKERPHONE

Keep the phone away from your brain by using speakerphone.

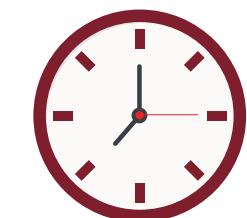
DO NOT SLEEP WITH YOUR PHONE

Use a battery-powered alarm clock, and power off the phone.



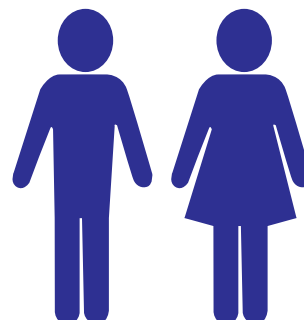
BEWARE THE LOW SIGNAL

The weaker your signal strength, the stronger the radiation from your phone.



REDUCE TIME

Reduce the time you spend on cell phone and wireless overall. Choose safer tech.



DISTANCE IS YOUR FRIEND

Phones should not be in your pocket, bra, or touching your body.

Learn more at www.ehtrust.org

BE SUPER-SMART REDUCE WIRELESS

Simple steps to practice safe tech.



TURN IT OFF WHEN NOT IN USE.

Avoid unnecessary radiation by powering off wireless devices, network equipment, and hotspots when not in use, like at bedtime.



PRE-DOWNLOAD INSTEAD OF STREAMING.

Remember that when you wirelessly stream videos or music the radiation goes into your body. It is better to pre-download audio and video files and then watch or listen with wireless connections turned off.



USE A PLUG-IN ETHERNET CORD.

It is super fast. Whenever possible connect your laptop, tablet, or computer with an ethernet cord (with Wi-Fi OFF, and Bluetooth OFF).

CORDED PHONE

Corded phones do not emit wireless radiation.



DISTANCE MATTERS.

Maximize the distance between people and wireless devices.



WIRED (NOT WI-FI & NOT BLUETOOTH)

Use a wired mouse, speakers, printer, game system, keyboard, tv, etc.

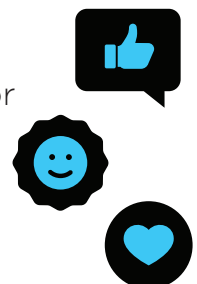
HEALTHY SLEEP

Remove electronics and wireless devices from around your bed. Do not sleep with your cell phone.



MINIMIZE FACETIME AND SOCIAL MEDIA ON CELL PHONES.

When you use facetime or post images, your phone emits more radiation. Instead, do social media or video sharing on a computer connected to the Internet by ethernet cord (with Wi-Fi turned off).



Protect yourself.

#PracticeSafeTech

BE SMART. REDUCE WIRELESS RADIATION.

- Don't sleep with your cell phone or wireless device.
- Prefer phoning in speaker mode or hands-free.
- Avoid carrying a phone near your body—like in pants, pockets or bra.
- Text with phone away from your body.
- Use a corded landline and minimize wireless.
- Switch to airplane mode in cars, elevators, trains, buses, planes. Your device pumps out more radiation in metal surroundings.
- Turn Airplane mode on with Wi-Fi/Bluetooth OFF under settings to eliminate radiation.
- Use laptops, tablets, and all electronic tech away from your body – NOT on your lap.
- Connect to the internet with wired cables & Wi-Fi settings OFF.
- Go corded for mouse, headphones, keyboard, router, speakers, printer, gaming, tv, microphone etc.
- Streaming large files like video and music results in higher radiation exposure.
- 5G and 4G cell antennas will increase your daily dose of radiation. Not to mention, it will also impact the birds, bees and trees. Educate yourself on 5G.

RESEARCH SHOWS:

Cell phone/W-Fi radiation can damage the **brain**, **sperm**, **your mood**, and **your sleep**, in addition to increasing cancer and **memory problems**.

MUSIC & VIDEOS:

Instead of streaming, download first, switch to airplane mode then click play **to avoid unnecessary radiation**.

100% SAFETY = CORDED CONNECTIONS

GET INVOLVED:

Your elected officials need to hear from you. Ask for **safe technology** and updated radiation limits that protect the public. You have a **right to know** that cell phones & wireless devices emit radiation.

More at **EHTrust.org**



Protect Yourself.

CELL PHONES EXPOSE YOUR BODY TO RADIATION

Research links this microwave radiation to:

- Damaged sperm
- Reduced sperm count
- Erectile dysfunction
- Memory problems
- Cancer

5G and 4G cell antennas will increase your daily dose of radiation. Not to mention, it will also impact the birds, bees and trees. Educate yourself on 5G.

All cell phones and wireless devices have fine print warnings hidden deep in manuals advising the device not be in contact with the body.

More at [EHTrust.org](https://www.ehtrust.org)

DOCTORS' RECOMMENDATIONS

1. PROTECT YOUR BODY

Do not carry cell phones in your pockets or bra. No laptops or tablets on your lap.

2. PROTECT YOUR BRAIN

Prefer a corded landline phone. Hold cell phones away from the head and body by using speakerphone.

3. PROTECT YOUR FERTILITY

No wireless devices near reproductive organs or near a pregnant woman's abdomen.

4. REDUCE WIRELESS

Turn off Wi-Fi and use cords to connect routers, phones, computers and other devices. Airplane Mode ON with Wi-Fi OFF turns off wireless.

5. DO NOT SLEEP WITH YOUR CELL PHONE

Cell phones and Wi-Fi devices are radiating even when not in use. Power off all devices at night, and keep them out of the bedroom.

Protect the ones you love.♥



AMERICAN ACADEMY OF PEDIATRICS RECOMMENDS: **REDUCE CELL PHONE AND WIRELESS RADIATION**

- Do not hold the cell phone up to your head. Use speaker mode or hands free to limit radiation exposure to the brain.
- Avoid carrying your phone against the body like in a pocket, sock, or bra. Cell phone manufacturers can't guarantee that the amount of radiation you're absorbing will be at a safe level.
- Make only short or essential calls on cell phones.
- If you plan to watch a movie on your device, download it first, then switch to airplane mode while you watch in order to avoid unnecessary radiation exposure.
- Keep an eye on your signal strength (i.e. how many bars you have). The weaker your signal, the harder your phone has to work and the more radiation it gives off.
- Avoid making calls in cars, elevators, trains, and buses. The cell phone works harder (and emits more radiation) to get a signal through metal.
- Remember that cell phones are not toys or teething items.

from AAP's HealthyChildren.org

Pre-download videos, programs & games onto tablet/phone/laptop so you can ensure Wi-Fi/Bluetooth/Cellular is off before handing device to child. Always keep digital devices OFF a child's lap.

RESEARCH SHOWS:

Cell phone/Wi-Fi radiation can damage the developing **brain**, **sperm**, and **sleep**. Research indicates increased **cancer risk**, **headaches**, **hyperactivity**, and **memory problems** from cell phone radiation.

All wireless devices emit the same type of radiation as cell phones.

AT HOME:

Easily reduce wireless radiation at home. Get a **corded landline phone** and forward cell phones to it.

100% SAFETY = CORDED ETHERNET CONNECTIONS

Use **non-wireless corded connections** for printers, mouse, computers, laptops, tablets, video game systems, e-readers, routers, keyboards, headphones, speakers, and other accessories – **with all wireless functions off.**

More at **EHTrust.org**

Protect the ones you love.♥



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AT HOME:

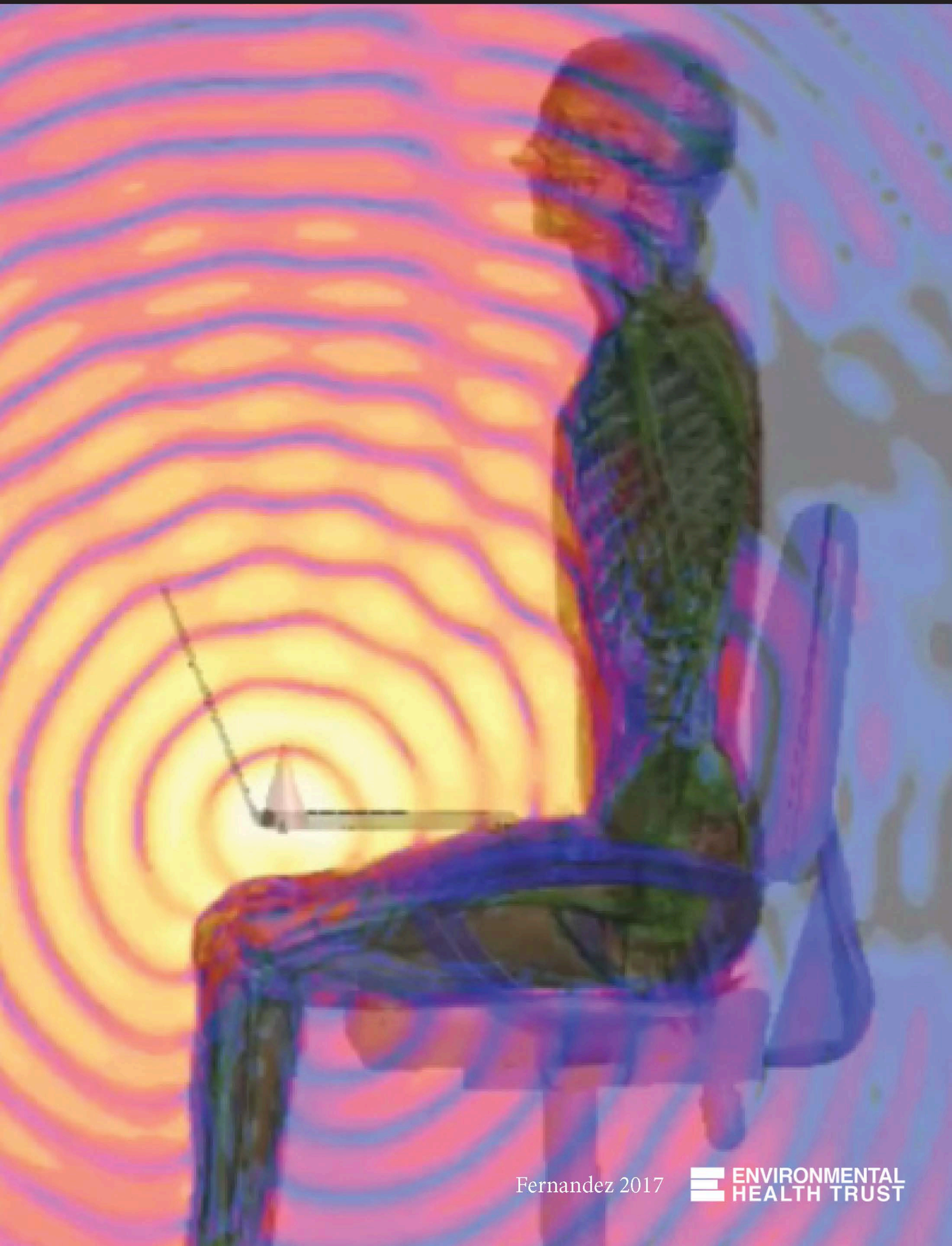
Easily reduce wireless radiation at home. Get a **corded landline phone** and forward cell phones to it.

100% SAFETY = CORDED ETHERNET CONNECTIONS

Use **non-wireless corded connections** for printers, mouse, computers, laptops, tablets, video game systems, e-readers, routers, keyboards, headphones, speakers, and other accessories – **with all wireless functions off.**

More at EHTrust.org

Wireless laptops expose your body to microwave radiation





HEALTHY TECH at HOME PROJECT

How To Minimize Wireless



Medical doctors and scientists recommend people reduce exposure to cell phone, Wi-Fi and wireless radiation. Scientific research has linked wireless to memory problems, cancer and harm to reproductive organs.

Use Speaker

Protect your brain and body by keeping the phone at a distance.

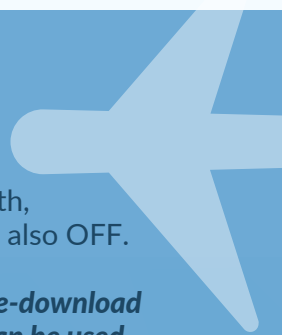
Minimize use and do not carry phones in pockets or use them near children.



Airplane Mode

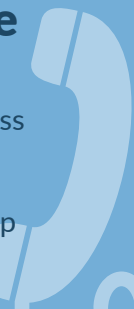
Turn antennas OFF with airplane mode more often. Remember to check that Bluetooth, Wi-Fi, 5G and other antennas are also OFF.

Tip: Instead of Wi-Fi streaming, pre-download music and videos so that devices can be used on Airplane Mode.



Corded Home Phone

Choose a corded phone over a wireless one. Why? Because cordless & DECT phones emit nonstop wireless radiation.



Switch to Wired Tech

Connect computers, laptops and tablets to the internet with ethernet, not Wi-Fi. Adapters allow you to plug ethernet into USB or lightning ports



5G & Cell Towers

Talk to your elected officials. 5G and 4G "small" cells towers should not be built near homes and schools.

Raise awareness in your community.



Tablets OFF Laps

Tablets and laptops expose your body to non-ionizing radiation.

Always use devices on a table or desk.



Simple Steps

Each step you take to reduce wireless exposure to your child will make a huge difference. Look around your home and one by one swap out each Wi-Fi and Bluetooth device with safer, corded and ethernet connected tech.

Safe technology is the way forward.

What Parents Need To Know About Safe Technology



Children are more vulnerable to wireless.

- 1 **Children have thinner skulls.** Research shows that children's developing brains, eyes, skull and bone marrow can absorb wireless radiation three to ten times more intensely than adults.
- 2 **The World Health Organization's International Agency for the Research on Cancer classified wireless radio frequency radiation as a Class 2B, Possible Human Carcinogen in 2011.** Cell phones are linked to increased brain and thyroid tumors. Risks are highest for those who first used a phone under the age of twenty.
- 3 **A landmark study by the U.S. National Toxicology Program** found "clear evidence" of cancer, heart damage and DNA damage in rats exposed to daily wireless.
- 4 **A 2018 study found impacts to the memory of teenagers who used cell phones to the head after just one year.** Numerous research studies links wireless exposure to hyperactivity, behavior problems, damaged sperm, and altered brain development.
- 5 **Wireless radiation at very low levels has been shown to change brain activity.** In 2011, NIH researchers found brain glucose metabolism increased from cell phone radiation.
- 6 **A Yale Medicine study found increased hyperactivity and memory problems in mice after prenatal cell phone exposure.** Now hundreds of doctors and scientists and educators recommend parents reduce their child's cell phone radiation exposure.

WORLDWIDE POLICY

Over 20 countries clearly recommend parents reduce their children's wireless cell phone radiation exposure.

France and Belgium have banned advertising and the sale of cell phones designed for young children.

Several countries have banned and/or restricted Wi-Fi from nursery schools, kindergartens and elementary.

IN FRANCE

Cell phones are labeled with safety information that says:

- Minimize children's use
- Use speakerphone to keep phone away from the brain.
- "Keep radio equipment away from the belly of pregnant women, and away from the lower abdomen of adolescents."



"For children the cancer risks may be greater than that for adults because of greater penetration and absorption of cell phone radiation in the brains of children and because the developing nervous system of children is more susceptible."

— Ron Melnick PhD,
Senior Toxicologist at National Institute
of Environmental Health Sciences, Retired

But wireless is everywhere?

Simple steps like keeping cell phones and Wi-Fi devices away from your child's head and body will significantly reduce a child's exposure and could greatly reduce your child's risk of cancer and other disease.

Why is it legal?

Wireless was never premarket tested for children's safety. A scientific review of all the science has not been done by the FDA, CDC, FCC, NCI nor the EPA.

Is our government doing anything?

The FCC's cell phone and wireless radiation exposure limits are from 1996. They do not protect children from health effects from long term exposures. It will take years before federal regulations are updated.

NEW JERSEY EDUCATION ASSOCIATION

How to minimize health risks from electronics

- Keep devices away from the body and bedroom.
- Put devices on desks, not laps.
- Hard wire all devices that connect to the internet.
- Hard wire all fixed devices such as printers, projectors and boards.
- Use hard-wired phones instead of cell or cordless phones.
- Turn off Bluetooth devices when not using them.



Hardwired & Coded Connections

- Swap out Wi-Fi with ethernet for computers.
- Special ethernet adapters allow you to hardwire smaller devices such as tablets and smartphones.
- Instead of Bluetooth, use hardwired coded connections i.e mouse, keyboard and speakers.

Did You Know?

Cordless phones, Wi-Fi and Bluetooth "smart" speakers, virtual reality, video game consoles, baby monitors, watches and fitness monitors all emit wireless radiation, even when you are not using them.

Create A Sleep Sanctuary

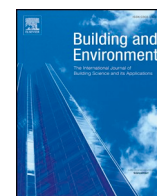
An easy quick start is to power off wireless networks at night. Remove electronics and screens from the bedroom.

American Academy of Pediatrics Safety Tips For Families

- > Use cell phones in speaker mode and distance the phone from your head.
- > Avoid carrying your phone against the body like in a pocket, sock, or bra. Cell phone manufacturers can't guarantee that the amount of radiation you're absorbing will be at a safe level.
- > If you plan to watch a movie on your device, download it first, then switch to airplane mode while you watch in order to avoid unnecessary radiation exposure.
- > Keep an eye on your signal strength (i.e. how many bars you have). The weaker your cell signal, the harder your phone has to work and the more radiation it gives off.
- > Avoid making calls in cars, elevators, trains, and buses. The cell phone works harder to get a signal through metal, so the power level increases.
- > Cell phones are not toys or teething items.
- > Make only short or essential calls on cell phones.

"The Council recommends limiting exposures... Wi-Fi can be turned off and wired local area network (LAN) can provide a reliable and secure form of networking ..without any microwave electromagnetic field exposure."

— Maryland State Children's
Environmental Health and
Protection Advisory Council
Wi-Fi in Schools Report



Building science and radiofrequency radiation: What makes smart and healthy buildings

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ABSTRACT

Radiofrequency radiation (RFR), used for wireless communications and “smart” building technologies, including the “Internet of Things,” is increasing rapidly. As both RFR exposures and scientific evidence of harmful effects increase apace, it is timely to heed calls to include low RFR levels as a performance indicator for the health, safety and well-being of occupants and the environment.

Adverse biochemical and biological effects at commonly experienced RFR levels indicate that exposure guidelines for the U.S., Canada and other countries are inadequate to protect public health and the environment.

Some industry liability insurance providers do not offer coverage against adverse health effects from radiation emitted by wireless technologies, and insurance authorities deem potential liability as “high.” Internationally, governments have enacted laws, and medical and public health authorities have issued recommendations, to reduce and limit exposure to RFR.

There is an urgent need to implement strategies for no- or low-RFR emitting technologies, and shielding, in building design and retrofitting. These strategies include installing wired (not wireless) Internet networks, corded rather than cordless phones, and cable or wired connections in building systems (e.g., mechanical, lighting, security). Building science can profit from decades of work to institute performance parameters, operationalizing prudent guidelines and best practices. The goal is to achieve RFR exposures that are ALARA, “As Low As Reasonably Achievable.”

We also challenge the business case of wireless systems, because wired or cabled connections are faster, more reliable and secure, emit substantially less RFR, and consume less energy in a sector with rapidly escalating greenhouse gas emissions.

1. Introduction

Radiofrequency radiation (RFR) exposures are increasing rapidly with wireless technologies, but rarely are the terms “building science” and “RFR” used in the same sentence. Building science attends to the physical performance of buildings, the comfort, health, safety of

occupants, and the larger natural and built environment [1]. “Science” includes physics and the electromagnetic spectrum, including RFR.

Building science considers the building *as a system* and devises effective solutions for design concerns. The primary system elements include: the building enclosure (building envelope); inhabitants (humans, animals, and/or plants); building services (electrical/mechanical/

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electronic systems); site, with its landscape and services infrastructure; and external environment (landscape, weather and micro-climate) [1]. To achieve a well-performing building, all these elements must be harmonized.

Historically, awareness of indoor environmental quality heightened with novel materials following World War II, and was bolstered with improved air-tightness during the energy crisis of the 1980s. Minimizing chemical off-gassing of composite materials, maintenance products and mold is advised to optimize indoor air quality and occupants' health [2]. Similarly, magnetic and electrical fields and currents with early electrical applications are also associated with adverse health effects. Assiduous adherence to electrical codes and best practices, and isolation of potentially problematic equipment, are among measures to address ongoing power-frequency, "dirty power" and ground current concerns [3,4].

Today engineers, architects, planners and others are challenged to keep abreast of research and policies that address potential harm from wireless technology. This paper builds on long-standing recommendations to expand the typical scope of building science to consider RFR [3,4]. It briefly describes RFR in the electromagnetic spectrum, use of wireless technology in "smart" buildings, and summarizes peer-reviewed, scientific research regarding biological effects on human and environmental health. Key reasons as to why action should be taken include potential liability risks when technology is not implemented safely. International measures and guidelines for lower RFR exposure are highlighted. Finally, practices are outlined and recommendations made to minimize the impact of RFR on public and environmental health in the design, construction and maintenance of safer, modern buildings.

Internationally, a broad range of standards and policies limit magnetic and electric fields over a broad range of frequencies, including RFR [5]. It is beyond the scope of this paper to address the full electromagnetic spectrum.

2. Radiofrequency radiation explained

2.1. The electromagnetic spectrum

The electromagnetic spectrum (Fig. 1) is a continuum ranging from low to high frequencies, associated with the longest to shortest wavelengths, respectively [6,7]. A distinction is made between high frequency non-ionizing versus higher frequency ionizing radiation that has enough energy to displace electrons and "ionize" atoms and molecules. Ionizing radiation includes ultraviolet light, X-rays and gamma rays. Below these frequencies, non-ionizing radiation includes visible and infrared light, and frequencies for wireless communications and radar. Lower frequencies are used to broadcast commercial radio and television, while alternating currents at 50 or 60 cycles per second or Hertz (Hz) are in power lines and building wiring.

RFR is sent wirelessly from a transceiver (e.g., Wi-Fi router) to another transceiver (e.g., computer) and vice versa. The RFR frequency range covered in guidelines and standards is generally from 3 kHz to 300 GHz and includes the microwave (MW) range. The terms RFR and MW are sometimes used interchangeably. Uses of frequency ranges overlap, so there are no precise boundaries for any particular technology. Information is encoded in the modulation (superimposed higher frequency irregularities) on a radiofrequency carrier wave. While the frequency of the carrier wave is stated in the manufacturer's specifications for various devices, the actual human exposure includes these overlain or superimposed signals [6]. Modern devices utilize multiple carrier frequencies.

Devices that receive and emit RFR include personal items that communicate wirelessly such as: cordless and mobile phones; computers, laptops, tablets and peripheral equipment; monitors (e.g., for babies, or medical purposes); toys, video game and entertainment systems; virtual reality headsets; GPS systems; and Bluetooth-enabled

"wearables" such as for personal fitness. RFR-emitting equipment that may be installed in buildings includes: wireless routers and associated mesh networks; "smart" utility metering; identification and security systems; cell boosters; power transfer/battery charging stations; and the "Internet of Things" (IoT) such as building systems (e.g., heating, ventilation and lighting), and appliance monitoring and control.¹ These devices are designed to use a number of presently used plus new radiofrequency bands, from 600 MHz to GHz frequencies. Fifth generation or 5G frequencies that are being licensed by the U.S. Federal Communications Commission (FCC) will include lower frequencies used for television, through higher frequencies into the millimeter wavelength range (above 30 GHz) [9]. Higher frequencies provide greater bandwidth, albeit with shorter range and poorer penetration of structures and vegetation; these are discussed in Section 3.1.

Microwave ovens and other RFR-emitting devices (e.g., Wi-Fi and cell phones) rely on similar frequencies, but the power and signal characteristics are different. Ovens heat with 1000 Watts (W) of continuous-wave radiation, whereas wireless devices are lower power; for example a cell phone is a two-way microwave radio, using on average less than 1 W of modulated radiation. Wireless communications signals, however, are in short bursts, that are biologically active, independent of the carrier frequency [10,11]. Another key feature of anthropogenic electromagnetic radiation is polarization; i.e., that the waves may be in one plane [12].

2.2. Regulatory history of RFR in the United States

In the U.S., the FCC authorizes and licenses devices, transmitters and facilities that generate RFR [13]. The U.S. does not have federally developed safety limits, as the Environmental Protection Agency never developed biologically based limits. The current FCC RFR exposure limits were adopted in 1996 based on recommendations from the National Council on Radiation Protection and Measurements (NCRP) [14], the American National Standards Institute (ANSI) and the Institute of Electrical and Electronics Engineers, Inc. (IEEE); specifically *IEEE C95.1-1991* and *ANSI/IEEE C95.1-1992*. None of these institutes have expertise in public health or biology. The FCC RFR exposure guidelines have not been substantially revised since 1996.

Presently, frequency bands between 9 kHz and 275 GHz have been allocated for various communications uses by the FCC [15].

2.3. RFR guidelines

The FCC RFR limits for public exposure reference three metrics: 1) the "Specific Absorption Rate" (SAR) is the rate at which RF energy is absorbed by human tissue; 2) power density, the rate of deposition of energy per unit area, is a function of the electrical and magnetic fields, at a particular frequency; and 3) the electrical field strength [7]. SAR limits apply to wireless wearable devices, cell phones and other items held close to the body. Power density limits apply to exposures at a distance, such as from cellular antennas and Wi-Fi.

2.3.1. Specific Absorption Rate (SAR)

The FCC and other governments' agencies require that all wireless devices such as cell phones or computers comply with SAR limits when the device is operating at its maximum power, before being placed on the market.

SAR is a measure of RFR energy dose to parts of the body closest to antennas, in the "near field," such as from the personal use of wireless devices. SAR is usually expressed in units of Watts per kilogram (W/kg) or milliwatts per gram (mW/g). The SAR for a given power density varies according to equipment details, the frequency and modulation,

¹ IoT is the comprehensive plan to connect billions of physical devices around the world to the Internet, collecting and sharing data.

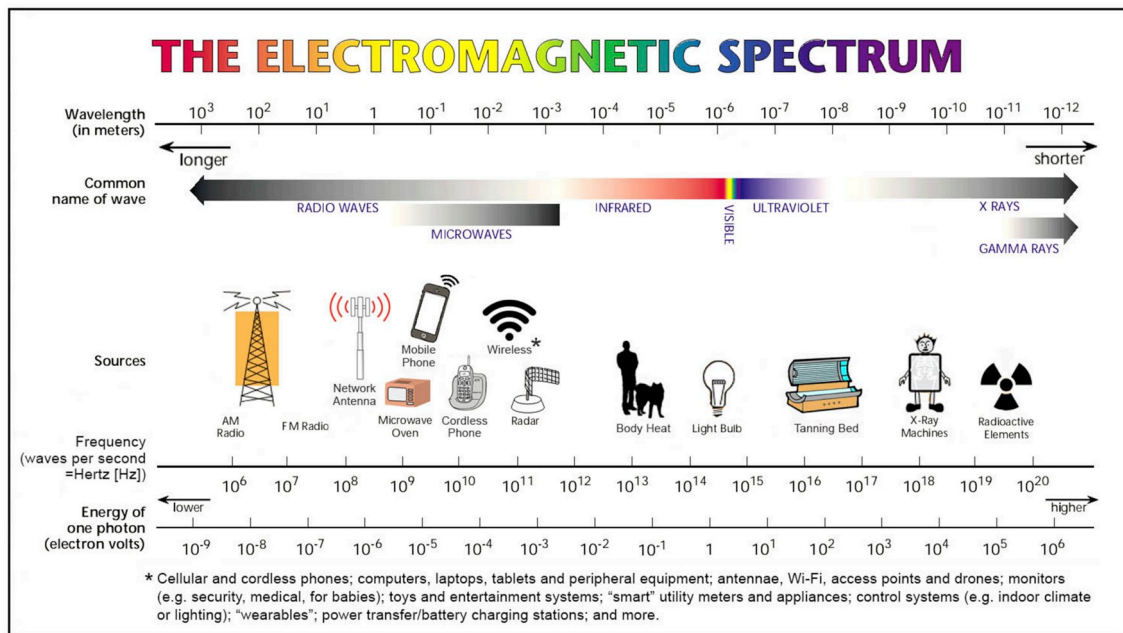


Fig. 1. The Electromagnetic spectrum (presented with permission) [8].

and the absorptive and reflective properties of the body or structure being exposed [7].

The FCC promulgated both public and occupational SAR limits. For the general public (commercial devices), the SAR limits for the head and the body are 1.6 W/kg averaged over a 1 g cube of tissue, and 4 W/kg averaged over a 10 g cube of tissue for ears, hands, feet, wrists and ankles [16]. Workers may be exposed to higher levels; occupational SAR limits are double those for the general public in the U.S., and five-fold greater for workers in “controlled environments” in Canada [17] as well as the many countries relying upon International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines [18].

Researchers have long criticized the SAR as an inadequate metric as it is measured in a mannequin – a liquid-filled phantom [19]. This does not capture the complex characteristics and interactions of living tissues’ electromagnetic properties, or of RFR signals (e.g., the wave perturbations necessary to transmit information may cause additional biological impacts) [20]. FCC SAR limits and the measured SAR levels can be found in the manufacturer’s instructions that come with every commercially sold wireless device, or on the manufacturer’s website.

SAR testing protocols do not require cell phones and devices to be tested touching the body/skin or in novel configurations such as for virtual reality, despite the fact that this is the way they are often carried and used today [20,21,22]. Some cell phones are tested at as much as 25 mm separation distance. The national agency regulating radio-frequency radiation in France (ANFR) tested 450 cell phones in various configurations. The SAR exceeded the standard for 90% of the models that were tested as if they were contacting the body [23,24]. More than a dozen models were withdrawn from the market or had software updates to reduce RFR emissions.

2.3.2. Power density

Power density measurements address compliance in buildings or outdoor environments, such as when concerns are raised about RFR exposures from a nearby cell tower or from the Wireless Local Area Network (WLAN) system in a school. The FCC exposure limits range from 0.4 to 1.0 mW/cm² (4000 to 10,000 mW/m²) [16] for commonly used frequencies.

Power density may be expressed as milliWatts or microWatts per square centimeter (mW/cm² or μW/cm²), or milliWatts per square meter (mW/m²).

For comparison, 1 mW/cm² = 1000 μW/cm² = 10,000 mW/m².

2.3.3. Electric field

“Electromagnetic” refers to both electrical and magnetic fields (EMF). Limits are established for electric fields, reported as volts per meter (V/m). Electric fields are commonly measured and reported during surveys of radiofrequency exposures, to characterize electromagnetic fields (EMF) across a broad range of frequencies [7].

2.3.4. Exposure attenuation

RFR reductions are generally reported as decibels. This is a non-linear, logarithmic scale, such that a signal that is 10 dB lower than another, is one tenth the signal strength of the comparator [25].

3. Information technologies and building science

Indoor environmental quality (IEQ) in more highly developed countries has advanced in terms of thermal comfort, air quality and construction for environmental performance (e.g., insulation), for example with guidance and classifications by The World Green Building Council [26] or Leadership in Energy and Environmental Design (LEED) [27]. These factors translate into familiar physical sensations of warmth, fresh air and comfort, versus cold drafts and stuffy air. Over the past decades, understanding of the modern sources of lower frequencies and now RFR within and surrounding building assemblies, and effects on inhabitants and surroundings, has gained recognition [3,28].

3.1. Developing technologies

Beyond Wi-Fi, a recent trend is the integration of wireless controls for lighting and heating/ventilation, as well as wireless security and audio/visual technology systems in buildings. “Smart buildings,” with “smart systems” and “smart appliances” allow users to monitor and to control many interconnected mechanical and electronic systems via computers or “smart phones.” Utility providers are utilizing “smart meters” for electricity, gas and water to transmit usage data electronically using RFR. Wireless charging stations for many items, from electronic devices to vehicles, may be additional sources of EMF.

Plans for the burgeoning IoT and 5th Generation (5G) wireless services are to transport large volumes of data quickly (e.g., for videos).

The proposed evolution of the “smart city” will imbue entire buildings and neighborhoods with higher levels of currently used frequencies, as well as the higher frequencies into millimeter wavelengths, which carriers plan to use in 5G [29]. A European Parliament report “5G Deployment: State of Play in Europe, USA, and Asia” explains how 5G radio emissions are different from those of previous generations because of their complex, highly focused, beam-formed transmissions, and that “it is not possible to accurately simulate or measure 5G emissions in the real world” [30].

Environments with very low RFR exposures can be achieved by choosing wired and fiber-optic cable connections, to buildings and throughout buildings. In fact, RFR is not only unnecessary for a “smart building;” wireless options will not match the bandwidth or reliability of fiber-optic or other cable options (“wired”) [31]. Wired options are faster and more secure, and require much less energy to operate [29,32], making them safer for human and environmental health.

4. Adverse health effects of RFR

4.1. Introduction

In many countries, guidelines and standards to protect the public from adverse effects of radiofrequency radiation (RFR) are based on an assumption that harm results only from excessive heating of tissue (thermal effects); however, numerous scientific publications document that RFR affects living organisms at exposures within regulatory parameters, at “non-thermal” levels.

“Microwave assisted chemistry” accelerates particular chemical reactions with low levels of RFR [33,34], and has been commercialized [33,35]. In living systems, the acceleration of some chemical reactions would cause molecular damage, chemical imbalances and dysfunction, and is consistent with observations of significant effects in humans, animals, plants and isolated cells.

Effects observed in studies of humans exposed to non-thermal levels of RFR include: cancer; early childhood developmental problems; brain, sperm and DNA damage; as well as electromagnetic hypersensitivity.

4.2. Cancer

4.2.1. RFR classified as a possible human carcinogen

The adequacy of RFR regulatory limits was challenged in 2011 when an expert panel convened by the International Agency for Research on Cancer (IARC) of the World Health Organization classified RFR (100 MHz–300 GHz) as a Group 2B, *possible* human carcinogen, largely based on the human epidemiological evidence of increased risk of glioma [36,37], a type of brain cancer. This classification includes

wireless frequencies from all types of RFR-emitting devices, including Wi-Fi. In 2019, an IARC advisory group recommended reassessment of the 2011 classification, in light of recent animal research [38].

4.2.2. Subsequent evidence supports upgrading the IARC classification

In 2018, Miller et al. concluded that as a result of human epidemiology, and animal studies published following the IARC 2011 panel meeting, RFR should be categorized as a Group 1 *known* human carcinogen [39]. Hardell and Carlberg came to the same conclusion [40]. Tobacco smoke and asbestos are in Group 1.

The main human evidence for this proposed classification upgrade is a large French epidemiological study [41], as well as a meta-analysis of pooled case-controlled studies in Sweden [42]. In addition, a 2018 Israeli occupational exposure study concluded that overall the evidence “make[s] a coherent case for a cause-effect relationship and classifying RFR exposure as a human carcinogen (IARC group 1)” [43]. A case series also reports breast cancers associated with carrying a cell phone in the bra [44].

Canadian data (2001–2004) showed evidence of doubled risk of developing glioma for adults who used cell phones for 558 lifetime hours or more [45]. Consistent with the increasing use of cell phones, there was a statistically significant increase in incidence of primary malignant brain and central nervous system tumors in children and adolescents in the U.S. between 2000 and 2010 [46], and brain tumors subsequently became the most common malignancy in children and adolescents, with disease shifting to more aggressive gliomas [47].

Further supporting evidence came from three recent RFR rodent studies. The first two studies reported higher incidence of cancers in male rats exposed to RFR: 1) a \$30 million study by the U.S. National Toxicology Program (NTP) of the National Institutes of Environmental Health Sciences (NIEHS), studied radiation simulating RFR intensity from cell phones [48]; and 2) a study by the Italian Ramazzini Institute [49] that was conducted at lower intensities (below FCC limits) designed to mimic radiation from cell towers. The tumors found in these large-scale studies were of the same histotype as in some human epidemiological cell phone studies.

A third large study demonstrated increased initiation and acceleration of tumor growth with RFR when the exposure was in conjunction with a cancer-causing chemical [50], replicating findings of a 2010 study [51].

4.3. Early life stages

During their rapid development, the embryo, fetus, infant and child are more vulnerable to many environmental insults, and impacts are potentially lifelong. Various life stages have different vulnerabilities

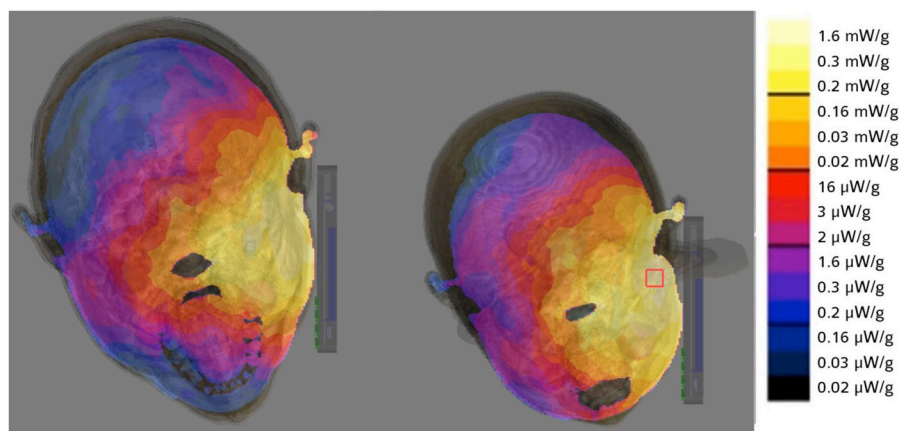


Fig. 2. Specific Absorption Rate (SAR) in adult and child (age 6 years) male heads with phone in talk position. The scale is 50 dB with 0 dB = 1.6 mW/kg. From work of Claudio Fernández, 2018 [20] (used with permission of Environmental Health Trust).

and susceptibilities to RFR [52,53,54,55]. Modeling indicates that children absorb substantially higher RFR doses from cell phones, in deeper brain structures, than do adults (Fig. 2) [20]. Research has also found proportionately higher doses to tissues in children compared with adults, from wireless laptops and utility meters [56,57,58].

Research has linked exposure during pregnancy to adverse effects. The authors of a case-control study published in 2015 stated, “use of mobile phones can be related to early spontaneous abortions” [59]. Maternal mobile phone use during the first trimester of pregnancy may contribute to slowing or halting of embryonic development [60], possibly due to effects on membrane receptors in human amniotic cells [61]. A 2019 study of over 55,000 pregnant women and infants in four countries (Denmark, the Netherlands, Spain and Korea) linked maternal cell phone use during pregnancy with shorter pregnancy duration and increased risk for preterm birth [62].

Behavioral problems have been associated with prenatal and postnatal cell phone exposure. In five cohorts, Birks et al. found cell phone use by a pregnant woman to be associated with an increased risk for behavioral problems, particularly hyperactivity/inattention in her child [63], and Divan et al. reported behavioral problems in children up to seven years of age [64,65]. Studies of children and adolescents report possible associations of wireless technology use with addictions and depression [66], fatigue [67], altered baseline thyroid hormone levels [68], and poorer well-being [69,70]. Sage and Burgio discuss the damage from low levels of RFR to genetic material including DNA and nuclear structures in the cell, and potential mechanisms of child neurodevelopmental impairment [71].

A Yale University study found that when mice were exposed *in utero* to cell phone radiation, they had impaired memory and increased hyperactivity in adulthood [72].

Not only can RFR act along with carcinogens to promote tumor development [50], it also may synergize with toxic chemicals in other ways. For example, in a study of Attention Deficit Hyperactivity Disorder in children, ADHD was associated with mobile phone use for voice calls only in children who were also exposed to relatively high lead levels (lead is an established, potent neurotoxin) [73]. Further synergistic effects between RFR and various chemicals including nutrients (i.e., both beneficial and adverse) are described in a 2016 review by Kostoff and Lau [74].

4.4. Sperm

Three systematic reviews published from 2014 to 2016 [75,76,77] reported significant adverse effects on sperm quantity and quality, as well as DNA damage, from everyday RFR exposures. Animal studies reported testicular damage at 0.002 W/kg [78] and sperm damage at 0.024 W/kg SAR values [79].

4.5. Wi-Fi and other ambient RFR

Much of the RFR research reported thus far has focused on exposures to users of devices in close proximity (e.g., cell phones). More distant sources such as Wi-Fi access points or cell towers generally contribute less to exposures because RFR drops off quickly with distance from the source, following the “inverse square law” (levels are a quarter at twice the distance; one-ninth at three times the distance; etc.). Although exposure intensities from distant sources are usually low compared with devices in close proximity, simultaneous exposures are complex as devices connect to networks, people move around, and RFR may be reflected or absorbed by building materials, other surroundings, and inhabitants [80,81].

At any particular point in space and time, electromagnetic exposures are the sums of electrical and magnetic field vectors [7]. Of importance for health, effects (e.g., oxidative stress and consequences in tissues) may be cumulative over time, and these effects are modulated by other exposures to chemicals (nutrients as well as adverse

substances) and other stressors [8]. 5G is to be deployed with multiple directional antennas, but future exposures are not well characterized [30], and less is known of future health outcomes from this technology.

In a comprehensive literature review, Pall states that “Wi-Fi causes oxidative stress, sperm/testicular damage, neuropsychiatric effects including EEG changes, apoptosis [cell death], cellular DNA damage, endocrine changes, and calcium overload,” that the effects from continuous, long-term exposure may be cumulative, and that pulsed signals are more biologically active than a smooth carrier wave [82].

Impaired brain development and cognitive function, as well as addictive behaviors in children and adolescents are observed with exposure to RFR [71,81]. In a study of exposure to RFR in schools, 18 teachers wore “exposimeters” to continuously record exposures to a spectrum of RFR. Mean exposure levels varied widely according to activities in the classroom, but peak measures were up to 83,000 $\mu\text{W}/\text{m}^2$ [81]. The highest levels occurred when students were streaming video, and the lowest occurred when the teacher had a wired Internet connection in a classroom far from Wi-Fi access points and students’ laptops were in airplane/flight mode [81].

Measurements of ambient RFR have been carried out in other settings, including a train station [80] and other Stockholm landmarks [83], and neighborhood surveys from a car [84]. Ambient measurements correlate moderately with personal monitoring.

In an extensive review, Dürrenberger et al. characterized RFR and emissions from infrastructure in micro-environments [85]. Exposures are typically underestimated, and experts, officials and citizens may be surprised at the differences among venues. These uncertainties make it statistically difficult to detect health effects, resulting in under-estimation of harms as well [86]. Although exposures generally meet government regulatory limits, they exceed precautionary recommendations [80]. Recent reviews of RFR assessments found higher levels in offices and public transportation [87,88].

Researchers in a Bavarian village followed a natural experiment over 18 months, when a central cell tower was installed [89]. They found dose-dependent dysregulation of stress hormones, according to peak RFR exposure measured at the doorstep [89].

Effects reported in RFR studies may be complex and non-monotonic (i.e., effects occur at lower exposure levels that do not manifest at higher levels) [48,50,90]. It is known that biological mechanisms are established whereby chemicals cause complex dose-responses, particularly for hormone-related effects (the endocrine system) [91,92].

4.6. Electromagnetic hypersensitivity (EHS)

As with other environmental exposures, some people are more susceptible (sensitive or intolerant) and overtly affected by RFR. Electromagnetic hypersensitivity (EHS) is also commonly termed electrical sensitivity, electrohypersensitivity, idiopathic environmental intolerance, or (historically) microwave sickness.

Common symptoms of EHS include headaches, cognitive difficulties, sleep problems, dizziness, depression, fatigue, skin rashes, tinnitus and flu-like symptoms [93,94]. Adverse reactions to wireless devices range from mild and readily reversible to severe and disabling, and individuals must greatly reduce their exposures to sources of electromagnetic radiation [95,96,97].

Surveys conducted in several countries at times ranging from 1998 to 2007 estimated that approximately three to thirteen percent or more of the population experience symptoms of EHS [98–101].

As well as being difficult to manage in the modern world, EHS is typically unexpected. The theory that EHS is merely a “nocebo” response – that it results from suggestion and worry over possible effects of electronic devices – is the opposite of experience. In a study of 40 people, their EHS was only recognized following a period of illness and self-experimentation [102]. Further research has confirmed that lived experience is not consistent with the nocebo hypothesis [103].

EHS is recognized as a disability and is accommodated in the U.S.

under the *Americans With Disabilities Act* [104]. Sweden recognizes EHS as a functional impairment [99]. In Canada, the condition is included under environmental sensitivities [97,105]. Legal cases for compensation, disability pensions and accommodation in various countries are discussed in Section 6.

Physicians' organizations' research, experiences, practices and statements over the years were summarized by the European Academy of Environmental Medicine (EUROPAEM) in 2016 [4]. Sensitivities vary among individuals, and symptoms may also occur with exposures outside the RFR range. The consensus of the *EUROPAEM EMF Guideline* is that the most important action for treatment and management of EHS is reduction and avoidance of pertinent exposures in locations where significant amounts of time are spent, especially in sleeping areas. Other recommended measures include a suite of healthy lifestyle measures such as nutrition, stress reduction and measures to avoid toxicants, as well as to reduce levels of toxicants sequestered in the body [4].

4.7. Rigorous systematic review of the scientific evidence, for public health, policy and regulation

As evidenced here, contributions of RFR to adverse effects on public health may be substantial [106,107]. Public policy, and safety guidelines and standards, should be based on all of the best available scientific evidence; however, there has never been a systematic review conducted according to international best practices [108] of the RFR evidence, upon which to base exposure guidelines.

Influence of biases and conflicts of interest has been documented as a serious concern for international authoritative bodies such as the World Health Organization-International Electromagnetic Fields (EMF) Project, and the International Commission on Non-Ionizing Radiation Protection [109–111]. The same is true for the national authorities in Australia [112], Canada [113–115], the European Commission [116], the United Kingdom [117] and the U.S [118]. Bias in original scientific studies is evident in that studies funded by industry are less likely to identify adverse effects than those that are independently funded, and even less likely to conclude that adverse effects exist [119–121].

An important step towards resolution of the adequacy of guidelines and standards to protect public health, as well as policy and practical responses for individuals who experience EHS, would be a thorough systematic literature review conducted by independent, knowledgeable specialists. This would examine all of the RFR literature dating back to the identification of health concerns with the development and deployment of radar during World War II, including the studies in the 1971 review by Dr. Zorach Glaser [122].

Key features of this type of review include that all steps and findings must be transparent, such as bibliographic search methods, study selection, data extraction and meta-analyses, quality assessment and the weight of evidence analysis [108].

5. Environmental impacts of cell tower and radiofrequency radiation

Built and natural environments are interconnected. Biological systems are integrated, complex and operate using minute electrical charges combined with precise chemical signals. These mediate complex functions such as development, reproduction and cognition. Recent research has demonstrated adverse effects of radiofrequency radiation (RFR) on environments and wildlife, including birds, amphibians, insects, fish, mammals and plants [123–125]. For example, trees near cell towers can become visibly unhealthy on the side facing a cellular antenna, and can die prematurely [126].

A diverse array of species depends upon the Earth's low-level magnetic field to navigate for migration, homing, breeding, foraging and survival. RFR can have significant long-term impacts on the natural environment via disruption of normal positioning and orientation

abilities as well as other complex cellular and biologic processes. Incremental effects may be only slowly recognized as species and ecosystems decline.

Small deposits of the iron-containing mineral magnetite act as magnetoreceptors to sense the Earth's magnetic field in a variety of organisms, including bacteria, insects, fish, birds and mammals [127–129].

Some bird species are strongly influenced by the low-intensity magnetic fields of the Earth for directional reference. Newer studies suggest that light-dependent cryptochrome photo receptors in birds' eyes are also sensitive to magnetic forces, and communicate with the brain [130,131].

RFR can interfere directly with magnetoreception in birds, disabling their avian magnetic compass [132]. A series of double-blinded studies replicated over several years demonstrated that migratory European robins lost their ability to orient and navigate in a city with high background "electromagnetic noise" and broadband frequencies [133]. Effects can be complex, as illustrated by findings that some birds can be more sensitive to weak broadband than to stronger fields [134,135].

Bees use magnetite crystals in their abdomens for navigation [136]. This sensory modality can be disrupted by electromagnetic fields, causing a loss of colony strength [137–140]. Scientists are increasingly concerned about the impacts of wireless radiation on the worldwide decline of domestic bees and colony collapse disorder [141,142]. Other insects are also adversely affected by RFR [142–145].

Review articles indicate that the weight of evidence is that RFR acts as an environmental toxin with ecosystem-wide harm from increasing ambient RFR emitted by cell towers and other RFR infrastructure [146–152].

6. Liability

Some industry liability insurance providers do not provide coverage against adverse health effects from RFR. Lawsuits for RFR health-related conditions are underway, and some have been successful in different countries.

6.1. Insurance industry and liability related to radiofrequency radiation

Insurers have declined to provide coverage to wireless product manufacturers and U.S. mobile operators for health damages from their products and networks since the early 2000s [153]. Insurers often exclude or limit coverage for the risk from electromagnetic fields (EMFs) posed by commercial general liability policies, decline policyholders in the wireless industry, and only provide coverage via pollution liability policy enhancements.

Insurance authorities also address the risks of electromagnetic fields. In 2014, the Swiss RE report *New emerging risk insights* listed the potential impact of the "Unforeseen consequences of electromagnetic fields" as "High" and examined further incremental risk associated with smart cities [154]. In its 2019 update, Swiss Re identified the top two emerging risks to be "digital technology's clash with legacy hardware, and potential threats from the spread of 5G mobile networks" [155].

In 2010, the Emerging Risk Team of Lloyds issued a white paper [156] indicating that the potential risks to insurers from health damage claims associated with cell phones and wireless radiation are comparable to those posed by asbestos. The 2013 Lloyds Risk Index lists "harmful effects of new technology" as an increasing environmental risk [157].

Some corporate insurance policies feature a general exclusion section that explicitly prohibits liability for injury or property damages from electromagnetic fields. This is considered to be a standard across the North American insurance industry [158].

Insurance company policies will often define electromagnetic radiation as a "pollutant." According to the AT&T Mobile 2012 Insurance policy, "Pollutants" mean: "Any ... artificially produced electric fields,

magnetic field, electromagnetic field, sound waves, microwaves, and all artificially produced ionizing or non-ionizing radiation and waste.” [159]. Policy enhancements can be purchased to cover environmental pollutants, which include EMFs [160,161].

The Austrian Worker's Compensation Board (AUVA) commissioned the Vienna Medical University to research effects of cell phone radiation on the brain, immune system, DNA and proteins, and published a series of reports that present the research evidence and conclude by recommending precautions to reduce exposure [162,163].

6.2. Summary of 10 K reports

Publicly traded companies issue annual 10-K reports to the U.S. Securities and Exchange Commission, summarizing the company's financial performance and status. Mobile operator reports identify potential liabilities for health damages from exposure to wireless devices as a risk, and provide no assurances that their products or equipment will be safe in future years.

Crown Castle states in their 2017 Annual Report [164], “If radio frequency emissions from wireless handsets or equipment on our communications infrastructure are demonstrated to cause negative health effects, potential future claims could adversely affect our operations, costs or revenues.”

Verizon's 2017 Annual Report [165] states, “... our wireless business also faces personal injury and wrongful death lawsuits relating to alleged health effects of wireless phones or radio frequency transmitters. We may incur significant expenses in defending these lawsuits. In addition, we may be required to pay significant awards or settlements.”

6.3. Lawsuits related to electromagnetic fields

In the U.S., the first cell phone cancer case was filed in 1992 and was followed by a series of cases that were either settled by confidential resolutions or dismissed due to lack of evidence or lack of authority of the court [166]. At the time of writing, there are thirteen active consolidated cases with defendants alleging their brain cancers were from cell phone use [167]. In 2017, Italy's highest court recognized a causal link between development of a brain tumor and cell phone use, and awarded social security payments [168].

Internationally there are several lawsuits related to cell phones and cancer and disability from EMF exposures. For example, Australian [169] and Spanish [170] courts have awarded disability to workers claiming sensitivity to electromagnetic radiation.

In January 2019, an Italian court ordered the government to launch a campaign to advise the public of the health risks from mobile and cordless phones [171].

7. International actions to limit public exposure to RFR

Some international governments have passed legislation (Table 1), and health and environmental authorities in numerous countries, regions and cities have issued recommendations (Table 2) to reduce exposure of the public to radiofrequency radiation (RFR). Measures frequently focus on children's vulnerabilities [172], identifying “sensitive areas” with stricter exposure limits where the young sleep, play and learn.

5G, the next generation of wireless technology, will utilize frequencies presently in use, plus higher frequency millimeter waves not previously used for commercial telecommunications. Regional governments, such as the Cantons of Geneva, Vaud and Neuchâtel in Switzerland, are issuing decrees calling for moratoriums on the rollout of 5G technology until the health effects are better understood [173–175].

7.1. Regional U.S. Guidelines and recommendations to limit RFR exposure in schools

In addition to national policies to reduce children's EMF exposures, several authorities in the U.S. have issued guidelines for schools. In 2014, the Collaborative for High Performance Schools (CHPS) [189], the leading organization for healthy schools in the U.S., first published recommendations to minimize exposure to both Extremely Low Frequency (ELF) magnetic fields and RFR. Criteria for “Low-EMF Best Practices” include:

- providing a wired local area network (LAN) for Internet access throughout the school;
- disabling all wireless transmitters on all devices;
- ensuring that all laptops or notebooks have an Ethernet port and a single physical switch to disable all wireless radios;
- providing easily accessible hard-wired phones for teacher and student use;
- prohibiting the installation or use of DECT cordless phones; and
- prohibiting the use of cell phones and other personal electronic devices in instructional areas.

In 2016, the New Jersey Educational Association [190] and the Maryland Children's Environmental Health and Protection Advisory Council (CEHPAC) [191] also issued recommendations to reduce RFR in school classrooms, including, “if a new classroom is to be built, or electrical work is to be carried out in an existing classroom, network cables can be added at the same time, providing wired network access with minimal extra cost and time.”

Measures to reduce exposures regarding personal devices are listed in the Appendix.

8. Recommendations for the building industry

Rapidly evolving technology is resulting in an evolution of building systems, moving to integration of air quality control, power management, surveillance and access, communications and data management, etc. in “smart” buildings. Although wireless “Internet of Things” may be popularized as central to “smart” infrastructure and conveniences, key features can readily be physically connected non-wirelessly. Sinopoli detailed essential elements of design, construction (installation of cables/wiring), integration and operation of networked systems to improve indoor environments and function, and achieve efficiencies in indoor spaces [192].

Electromagnetic interference is another reason to minimize radio-frequency radiation RFR [193]. It can degrade operation of wireless systems (e.g., Wi-Fi), and sensitive electronic equipment (wired or wireless) such as for entertainment recording or medical applications. Addition of cell towers in proximity to unshielded areas (indoors or outdoors) can also cause signal interruptions and static. In the extreme, wireless systems can be shut down by malicious attack with strong signals “drowning out” signals on designated frequencies.

Health care policies have evolved to protect operation of essential equipment. Mobile phones were initially forbidden in hospitals due to risks of interference with operation of sensitive equipment. Based on limited study, it is now recommended that wireless devices be kept at a distance from sensitive equipment (e.g., in intensive care units [ICUs]) [194]. Today, wireless access for patients and the public is often provided in hospitals, and wireless devices are common in healthcare [195]. There is no evidence of clinical benefit, and reviews did not investigate potential clinical harms [195].

For any systems that are not “wired,” architects, builders, owners and inhabitants all must operate within constraints of regulated RFR exposure levels. RFR exposure limits vary among jurisdictions, with the highest permitted personal exposures in the U.S.A. and Japan. Many countries adhere to the International Commission on Non-Ionizing

Table 1
Examples of national legislation limiting RFR.

Year	Country and Reference	Legislation
2016	French Polynesia [176]	Banned marketing of cell phones to children. Prohibited wireless in nursery schools.
2015	France [177]	Banned Wi-Fi from nursery schools. Decreed that in schools Wi-Fi be turned off as default, unless the teacher uses it for specific instruction. Wi-Fi hotspots must be labeled.
2014	Korea [178]	Mandated SAR labeling on cell phones and portable devices. Public health recommendations to reduce exposure to cell phone radiation.
2013	Belgium [179]	Banned marketing of cell phones to children below age 14. Phones designed for children below age 7 years are prohibited from sale.
2012	India [180]	Limited RF-EMF exposure levels from cell antennas to 1/10th of International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines. Required SAR labeling on phones.
2012	Greece [181]	Forbade installation of mobile phone base stations on the premises of schools, kindergartens, hospitals or eldercare facilities.
2010	France [182]	Required that cell phones be sold with a headset and recommendation to limit exposure to the head. Cell phone advertising aimed at children below age 14 years was banned.

Radiation Protection (ICNIRP) recommended guidelines for power flux density, electrical fields and SAR for various frequencies [196]. Exposure limits range widely, for example in terms of power density at 900 MHz, as summarized in Fig. 3.

8.1. Building guidelines for lower electromagnetic field (EMF) exposures

Green building standards for occupants' health put great emphasis on indoor air quality, and the electromagnetic characteristics of the indoor environment are beginning to gain more widespread attention. This is exemplified by the aforementioned CHPS "Low-EMF Best Practices" in the U.S [189].

In Austria, Germany and Switzerland, however, electromagnetic fields and radiation exposures have long been a green building consideration. In Germany, the first precautionary exposure guideline for sleeping areas (SBM-2015) [28] was issued by Baubiologie Maes in cooperation with the Institute of Building Biology and Sustainability (IBN) in 1992. Based on thousands of electromagnetic assessments, radiofrequency radiation (RFR) levels in the bedroom below $0.1 \mu\text{W}/\text{m}^2$ are considered "no anomaly." RFR levels above $1000 \mu\text{W}/\text{m}^2$ ($1 \text{ mW}/\text{m}^2$) are considered an "extreme anomaly."

The Total Quality Building Assessment Tool (TQB) is a widely used green building rating system [199], addressing a broader range of parameters than the Leadership in Energy and Environmental Design (LEED) rating system [27]. Since its inception in 2001 the TQB tool has included low-intensity EMFs and radiation – both low-frequency alternating magnetic fields and RFR. The TQB awards points in the planning and final testing stages for low levels of RFR.

The European Academy for Environmental Medicine (EUROPAEM) EUROPEAM EMF Guideline 2016 for the prevention, diagnosis and treatment of EMF-related health problems and illnesses [4] details recommendations for precautionary threshold electromagnetic exposure levels, including for RFR.

Table 2
Examples of national policies, public health advice and medical organization recommendations.

Year	Organization and Reference	Advice and Recommendations
2017	Athens Medical Association [183]	Sixteen recommendations to reduce human exposure to wireless radiation
2016	France - National Decree [184]	Reduced EMF exposure of workers, especially pregnant women
2016	US - American Academy of Pediatrics [185]	Ten recommendations to reduce exposure to cell phone radiation
2015	Cyprus National Committee on Environment and Child Health [186]	Public service videos and brochures for families about how to reduce cell phone and wireless exposure
2009, 2015	Finland - Radiation and Nuclear Safety Authority [187]	Recommendations to reduce RFR exposure, especially of children
2011	Parliamentary Assembly, Council of Europe [188]	"The potential dangers of electromagnetic fields and their effect on the environment" recommends As Low As Reasonably Achievable (ALARA), awareness, precautionary approaches, transparency, research, etc.
2010	France - National Public Health Agency [182]	An awareness campaign about ways to reduce RFR exposure

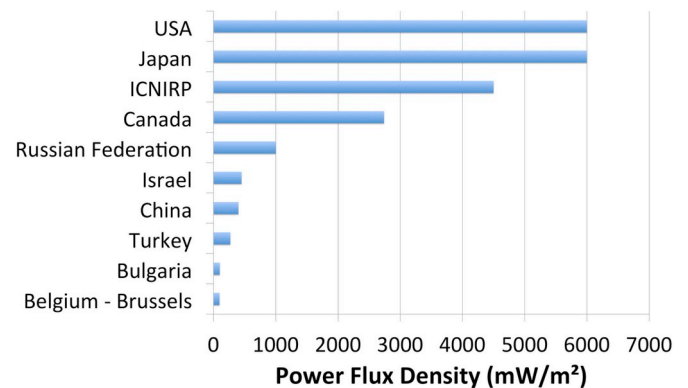


Fig. 3. International RFR power flux density exposure limits at 900 MHz [197,198].

To put these recommendations into context, the precautionary thresholds fall somewhere between the low natural background level and official exposure limits (Fig. 3). For comparison, Table 3 summarizes prudent, precautionary recommendations of European specialists.

The guiding principle of "as low as reasonably achievable" (ALARA) was introduced as early as the 1950s to protect against ionizing radiation [200] and holds true for many toxicants to the present day [91], including RFR [201]. RFR levels in indoor environments can be minimized by integrating the principal of ALARA (minimize emissions and exposures, maximize distance and use protection) [202] into selection of the building location, design and materials, as well as choices of electrical, monitoring, control, surveillance and other systems and services.

Table 3
Precautionary guidance RFR exposure levels [4,199].

		Exposure to 900–1800 MHz RFR (mW/m ²)
TQB Tool	Planning stage	
	10 points (best)	≤ 1
	5 points	≤ 3
	0 points	> 3
	Final stage	
	10 points	S ≤ 0.01
	8 points	0.01 mW/m ² < S ≤ 0.1
	6 points	0.1 mW/m ² < S ≤ 1
	4 points	1 mW/m ² < S ≤ 3
	0 points	> 3
EUROPAEM 900/1800 MHz	Daytime	0.1
	During sleep	0.01
	Sensitive	0.001
	Populations	
Natural Background		0.000000001

8.2. Strategies to eliminate or minimize RFR exposures from sources within buildings

As exemplified in section 8.1, engineers, architects, designers and planners have a unique opportunity to create healthier living, learning and work environments by reducing use of wireless technologies and thereby reducing levels of RFR. Although it is simpler, preferable and less expensive to implement RFR-free options during the initial design and construction stages, existing buildings represent many opportunities for improvements.

8.2.1. Connect necessary technologies with cables

An important first step to minimize levels of RFR within buildings is to eliminate indoor sources of RFR, and to connect all technologies via wire or fiber cable (“wired”).

Consider alternative approaches to wireless technology. Recommendations include:

- Neighborhood infrastructure with cable access for high-speed, wired telephone and Internet;
- Within buildings use cables, preferably shielded, in Local Area Networks (LAN) to provide wired access points for all networking and data transmission, including wired connections for modems, routers, Internet and media; lighting, heating, ventilation, air conditioning (HVAC), thermostats and humidistats; surveillance and security systems; fire detection and response (e.g., sprinklers); pool equipment such as pump and treatment controls, etc.;
- Install easily accessible wired (not cordless) phones and prohibit installation and use of cordless phones;
- Throughout the building, provide connections to hardwired CAT6 or CAT7 Ethernet cables, preferably shielded, to service devices such as computers, tablets and other devices. Use wired peripherals and accessories. Ensure that all wireless features are turned off or disabled;
- Install wired RJ11 phone jacks for corded and landline telephones; and
- Use analog, non-transmitting utility (water, electricity, gas) meter options, that do not transmit data wirelessly.

8.3. Strategies to minimize the RFR exposures from external sources

8.3.1. Building location and landscaping

To achieve very low RFR levels, new buildings may be located in a low-RFR environment, for example at a distance from cell towers, radio and TV broadcast towers, and radar sites (e.g., airports). Evaluate the proposed location with professional grade RFR equipment to determine

ambient RFR levels and sources. Sites in valleys may be at least partially protected from regional sources of RFR by surrounding hills, as may underground structures by intervening earth that absorbs RFR, depending upon composition and moisture level [203]. Conductivity and permittivity of soil increases with moisture content [204]; MW radiation is strongly absorbed by water.

Vegetation, with its significant water content, will absorb some RFR. While foliage of tall deciduous or evergreen trees may present challenges to wireless service providers, absorption of RFR from nearby antennas may also harm vegetation [126].

8.3.2. Building materials and shielding

RFR may be either reflected or absorbed by building materials, and there is a continuum of how opaque building elements are to RFR [204]. Shielding with highly absorbing or conductive materials can be very effective to reduce RFR originating from outdoors sources [205].

Many building materials such as wood and wallboard are largely transparent to present day RF signals, but research is intensifying on RFR-absorbing materials and fabrics that contain metals or carbon based substances (e.g., nanotubes) [206,207]. Construction materials are less effective barriers to RFR in the MHz and lower GHz frequency ranges, as currently used for cell phones, than for higher GHz frequencies planned for 5th generation (5G) technologies [208].

Absorption rather than reflection offers clear advantages for protection from RFR, and considerable relevant research has been devoted to materials that absorb radar [205]. Thick layers of dense building materials such as concrete offer some potential to absorb RFR and thereby reduce levels, particularly in the GHz range. Early research indicating high attenuation [209] was not precisely replicated with drier samples.

Conductive materials must be used with care and caution because reflections may result in unanticipated exposures. Totally enclosing a space with reflective materials (e.g., metal) results in a “Faraday cage.” Radiation from sources within the “cage” reflects from one surface to another and this can result in higher local levels than would be the case if RFR was transmitted or absorbed by structural materials and furnishings.

To shield against incoming RFR from cell antennas, Wi-Fi networks and radio broadcast towers, shielding may be integrated across the entire building envelope or selected rooms or zones of a building.

Low-E windows coated with a transparent layer of metal oxides (developed to reflect infrared to retain heat in buildings and reflect ultraviolet light from the outdoors) and metals reflect RFR. Exterior shielding may be achieved with metal cladding/roofing, metal window and door frames, metal or metal-clad doors, low-E windows, metal screens, RF window film, and fine metal mesh or radiant barrier foil integrated into the building envelope. Further options indoors include high quality carbon-based shielding paints or fine metal mesh, and RF-shielding drapes/sheers. Conductive shielding materials including paint must be electrically connected and properly grounded.

It is essential to recognize that within shielded spaces, devices must have all wireless functions turned off. Poor network connections for cell phones will result in stronger RFR signals from the device itself, with potentially four-fold higher exposure to the user [210], and reflections from metal shielding may result in yet higher exposures. Thus, prominent explanatory safety notices are necessary to ensure that all cell phones are “off,” set to “airplane mode,” or are left outside of the low-RFR shielded zone. Options to meet occupants’ needs include provision of accessible corded landline telephones to which cell phone calls can be forwarded, and provision of wired connections for devices.

Whatever options are used to achieve low RFR levels, it is necessary to verify final results with measurements using an RFR meter. RFR from equipment and exterior sources, along with reflections, and interactions with conductive infrastructure can result in complex, unanticipated patterns of electromagnetic fields, including hotspots [193,208]. Periodic checks are necessary to ensure that additional equipment,

furnishings or modifications, indoors or outdoors have not increased RFR levels.

Each make and model of RFR meter or measurement instrumentation has different specifications. To confirm the effectiveness of an RFR meter, obtain a third-party calibration report from a certified testing facility.

8.3.3. Partial RFR-Reduction measures for internet connectivity in buildings

In homes, schools, and workplaces, the installation and exclusive use of wired Internet access and electronic communication among devices mitigates the RFR emissions from internal network systems.

During any time that a wireless function is enabled, on stationary or mobile equipment, routine signals to maintain connections will expose building occupants to RFR, whether or not the device is actually being used.

In situations where decision makers decide not to hardwire a building immediately and instead continue with wireless connectivity, some partial measures may partially reduce unnecessary exposure. Importantly, these partial reduction steps do not equate with complete RFR mitigation, do not ensure safety for occupants, and do not reduce liability.

Recommendations include:

- Connect routers to a power source using a timer, to power off when not routinely in use, such as at bedtime;
- Wireless routers and access points should have an easily accessible switch to turn them off when not in use;
- Choose routers that can accommodate wired input, equipped with an accessible on/off switch for wireless features, and use a wired connection to a wired modem, to provide Internet connection when the wireless function is turned off;
- Avoid modems that also act as public “hot spots;”
- Do not install wireless access points near bedrooms or other highly or frequently occupied spaces;
- Clearly label wireless access points and areas where wireless antennas are in use;
- Use wired connections for HVAC monitoring and control, lighting, security and other fixed monitors and controllers;
- For improved security and lower carbon footprint, as well as reduced RFR, access data and controllers via a wired connection;
- If a wired analogue utility meter is not an option, mount the wireless meter at a distance, shield appropriately and direct signals to where they are read. Locate wireless meters away from high-use areas, particularly bedrooms; and
- If the building is mostly shielded, but has an unshielded zone for wireless device use, ensure that there is signage informing people: 1) of the RFR exposures along with wireless access (and alternatives onsite); and 2) the need to have all wireless functions turned off in shielded zones.

Implementation of partial measures will continue to expose occupants to RFR at levels associated with adverse effects. Measures such as turning off wireless features when not in use still result in RFR exposures, are not ALARA, and ideally will only be used in the interim while wiring plans are being developed and implemented.

8.4. Sensitive and vulnerable individuals

All of the above and more may need to be implemented to reduce RFR adequately in indoor and outdoor environments, to accommodate sensitive individuals. This will often require engaging an EMF expert, because the behavior of electromagnetic fields, currents and radiation is complex and difficult to predict. Sensitive individuals must be consulted throughout the duration of any renovation or building project, because individuals may react differently to various electromagnetic exposures. These individuals may also be sensitive to indoor air quality,

so they must be involved in selection of materials for construction or retrofitting [2].

8.5. Challenging the business case of wireless systems

Not only are multiple risks invoked by choices of wireless instead of wired technology, there are many advantages to wired solutions.

Wireless networks [29,211]:

- continue to be about 100 times slower than wired systems;
- are unreliable, and more prone to both latency and delay issues;
- consume significant amounts of energy – more than wired – and are not sustainable;
- increase the points of vulnerability; and
- increase the security and privacy risks to personal and business data.

Some companies are cautioning that deployment of wireless 5G and beyond will be hampered by current regulatory power density exposure limits [212,213].

9. Discussion and conclusion

The breadth of peer-reviewed scientific research demonstrating biological effects of radiofrequency radiation (RFR) below current guidelines and standards highlights the need to further develop and codify pertinent building technology standards and guidance. Public health risks, accessibility needs, industrial liability and international precautionary actions indicate that RFR is an important performance parameter in building science.

Parallel with rapid innovation in wireless technologies, and the increasing RFR both inside and outside building structures, building science must also innovate to include alternative, physically connected technologies and systems. This is important to achieve accessibility and a building's success. Ensuring that the health and safety of occupants are not compromised requires those in the building science professions to develop and apply needs and means assessments, as well as best practices for methods and models for communications, with RFR wireless technology as a less-preferred option.

Research and knowledge transfer are needed to develop, publish, and encourage compliance with explicit directions for the integration of wired communications technologies in the design, planning, engineering, construction, operation and life cycle of a building.

Building science has embraced ecology and sustainability as core tenets in building performance. Currently, modern technologies minimizing RFR exposures offer an under-addressed opportunity for “smart” buildings also to be healthy – for their occupants, and for natural and built environments.

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Appendix

General Safety Tips to Reduce Radiofrequency Radiation (RFR) Exposure from Personal Devices

- Keep cell phones away from the head and body, and keep wireless devices at a distance, and off of laps.
- Make only short or essential calls on cell phones.
- Use text messaging instead of voice calls whenever possible.
- As much as possible power off phones and personal digital devices, or set on airplane mode with Wi-Fi, Bluetooth, Data, Mobile Hotspot and Location off.
- Avoid sleeping next to cell phones or wireless devices; power them

off at night. If a cell phone must be used as an alarm clock, turn the phone to airplane mode, or use a separate battery-powered clock.

- Keep non-prescription electronics out of bedrooms. If you depend upon medical devices with wireless functions, check how often they may be set to “airplane mode,” and ask your health care provider about adequate alternatives that do not emit RFR.
- Avoid charging phones and devices near beds.
- Use a corded (not cordless) home phone (wired [not wireless] VoIP or landline) whenever possible, especially for long voice calls.
- Pre-download videos and music rather than streaming.
- Minimize the number of apps running on wireless devices.
- Choose wired Internet connections instead of wireless systems, whenever possible. Provide wired Internet connections for others.
- If Wi-Fi cannot be entirely eliminated, put the Wi-Fi router on a timer to turn off when not needed (especially while sleeping).
- When digital devices are connected with wired Internet connections, turn off the Data, Wi-Fi and Bluetooth (in device settings) and turn off the Wi-Fi on the router.
- Request wired options and provide them to others, such as for computers, laptops, tablets, printers, gaming consoles and handsets, mouse, keyboards, video cameras, speakers, headphones, microphones and other accessories.

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