

American Academy of Environmental Medicine

6505 E Central • Ste 296 • Wichita, KS 67206 Tel: (316) 684-5500 • Fax: (316) 684-5709 www.aaemonline.org

Executive Committee

August 27, 2013

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Amy L. Dean, D.O., FAAEM 1955 Pauline Blvd Ste 100D Ann Arbor, MI 48103

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Janette Hope, M.D., FAAEM 304 W Los Olivos Santa Barbara, CA 93105

Re: ET Docket No. 13-84

Washington, D.C. 20554

Office of the Secretary

445 12th Street, SW

Federal Communications Commission

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Dear Federal Communications Commission Commissioners:

The American Academy of Environmental Medicine is writing to request that the FCC review radiofrequency (RF) exposure limits, recognize non-thermal effects of RF exposure, and lower limits of RF exposure to protect the public from the adverse health effects of radiofrequency emissions.

Founded in 1965 as a non-profit medical association, the AAEM is an international association of physicians and scientists who study and treat the effects of the environment on human health. With an elite membership of highly trained physicians and clinicians, AAEM is committed to education, public awareness and research regarding Environmental Medicine.

It became clear to AAEM physicians that by the mid 1990's patients were experiencing adverse health reactions and disease as a result of exposure to electromagnetic fields. In the last five years with the advent of wireless devices, there has been an exponential increase in the number of patients with radiofrequency induced disease and hypersensitivity.

Numerous peer reviewed, published studies correlate radiofrequency exposure with a wide range of health conditions and diseases. These include neurological and neurodegenerative diseases such as Parkinson's Disease, ALS, paresthesias, dizziness, headaches and sleep disruption as well as cardiac, gastrointestinal and immune disease, cancer, developmental and reproductive disorders, and electromagnetic sensitivity. The World Health Organization has classified RF emissions as a group 2 B carcinogen. This research is reviewed and cited in the following attached documents: AAEM Electromagnetic and Radiofrequency Fields Effect on Human Health and AAEM Recommendations Regarding Electromagnetic and Radiofrequency Exposure.

The scientific literature proves that non-thermal adverse effects of RF exposure exist and negatively impact health and physiology. New guidelines based on measurements of non-thermal effects and lowering limits of exposure are needed and critical to protect public health.

In fact, electromagnetic sensitivity and the health effects of low level RF exposure have already been acknowledged by the federal government. In 2002, the Architectural and Transportation Barriers Compliance Board stated:

"The Board recognizes...electromagnetic sensitivities may be considered disabilities under the ADA if they so severely impair the neurological, respiratory or other functions on an individual that it substantially limits one or more of the individual's major life activities"

Additionally, in 2005, the National Institute of Building Sciences, an organization established by the U.S. Congress in 1974, issued an Indoor Environmental Quality Report which concluded:

"For people who are electromagnetically sensitive, the presence of cell phones and towers, portable telephones, computers,... wireless devices, security and scanning equipment, microwave ovens, electric ranges and numerous other electrical appliances can make a building inaccessible."

By recognizing electromagnetic sensitivity, the federal government and affiliated organizations are clearly acknowledging the existence of non-thermal effects. The AAEM urges the FCC to recognize that non-thermal effects of RF exposure exist and cause symptoms and disease. The AAEM also requests that the FCC base guidelines of RF exposure on measurements of non-thermal effects and lower the limits of RF exposure to protect the health of the public.

Sincerely,

Amy L. Dean, DO, FAAEM, DABEM, DAOBIM President

Attachments:

AAEM Electromagnetic and Radiofrequency Fields Effect on Human Health
AAEM Recommendations Regarding Electromagnetic and Radiofrequency Exposure
Access Board Rules and Regulations 2002
NIBS IEQ 2005 report