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Private Citizen

March 9, 2018

Subject: PUBLIC COMMENT
Comment:

It has been common knowledge for several decades that excess exposure to radiofrequency radiation can adversely affect health. In fact, extremely high levels are known to be fatal. Knowing this fact, the FCC – in consultation with the EPA, FDA, OSHA and NIOSH, has set maximum permissible exposure (MPE) limits to protect workers and the general public.

The FCC limits for general population whole-body exposures is SAR 0.08 W/kg. But, the NTP studies exposed animals to whole-body exposures up to wbSAR 10 W/kg – which is 125 times higher than the FCC MPE limit allowed for human exposures from wireless devices. It is not surprising that this experiment resulted in some adverse affects.

 "The levels and duration of exposure to RFR were much greater than what people experience with even the highest level of cell phone use, and exposed the rodents' whole bodies. So, these findings should not be directly extrapolated to human cell phone usage," said John Bucher, Ph.D., NTP senior scientist.

To put this comment into perspective, consider that if the top experimental exposure of wbSAR 10 Watts per kilogram was applied to the average 80 kilogram adult human, the RF power of the device would need to be 10 x 80 = **800 Watts**. Since the highest average output of a typical cellphone is ¼ Watt, it would take 800 x 4 = **3,200 cellphones** to produce the required power. Not a very realistic exposure scenario!

Even the lowest experimental exposure of wbSAR 1.5 W/kg is 1,875 % higher than the FCC MPE limit of wbSAR 0.08 W/kg. Clearly, no experimental exposure used in these studies came remotely close to actually mimicking the FCC maximum permissible exposure that any human could experience in real world situations.

The planned follow-up studies should be expanded to include more realistic exposure levels; along with additional frequency bands and transmission protocols as used in current and emerging technologies.

Respectfully submitted,

Tom Whitney