

Lagroye

Ecole Pratique des Hautes Etudes, PSL research University

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Subject: NTP General Public Comments Submission

Comment:

The reports and related documents present the NTP data as 'toxicology and carcinogenesis studies in HSD:SPRAGUE DAWLEY SD rats and B6C3F1/N mice exposed to whole-body radio frequency at a frequency (1,900 MHz) and modulations (GSM and CDMA) used by cell phones '. The wording "used by cell phones" is inappropriate and at least misleading, even for NIEHS people. Indeed, one can read in the first paragraph of the press release (02/02/2018): 'The exposure levels used in the studies were equal to and higher than the highest level permitted for local tissue exposure in cell phone emissions today': this is not correct. Experiencing 1.5 W/kg in the whole brain from a whole-body exposure is "not equal to" experiencing 1.5 W/kg in part of the brain from a local exposure in terms of physiological consequences; it is just not comparable. This statement is in contradiction with the accurate comment of John Bucher in the fourth paragraph – that most people may not have read – "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". Yes, indeed, although informative, these findings cannot and shouldn't be directly extrapolated to human cell phone usage. This needs to be clearly stated.