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**LETTERS OF
OBJECTION TO
ISSUANCE OF USE
PERMIT**

JUL - 9 2015

PLANNING DEPARTMENT

Elton and Laura Allred
19525 American Flat Side Road
Fiddletown, California 95629

July 6, 2015

Amador County community Development Agency
Planning Department County Administration Center
810 Court Street
Jackson, California 95642-2132

re: 19580 American Flat Side Road, Assessor's Parcel Number : 015-020-016

To Whom It May Concern,

We are in receipt of The Epic Wireless Group, LLC/Verizon Wireless Commercial Wireless Service Facility Application notice. We do have concerns with the construction as proposed. Our concerns are to protect the character of our neighborhood, protect us and our guests from any new potential for health and safety hazards, and to maintain the visual quality of our adjacent property in Amador County.

Our first concern is set at 19.48.150, Section G Development Standards, 1, regarding "Aesthetic Considerations."

This section says that the structure *"...shall take into consideration the aesthetic impact of the proposed wireless service facility and shall include conditions of approval to minimize the visual impact of the wireless service facility as seen from roadways and **other properties should any adverse effects be noted.**"* [Emphasis added] Our view of said tower will be significantly more than the "Photosimulation" pictures submitted at road level. At road level the proposed position appears to be hidden by trees. However, at our home level, some 200 feet up in elevation, we most likely will have complete visual of the tower, which will affect the aesthetic condition of our neighborhood and our property, including property value. (See attached photos)

Our second concern is set at 19.48.150, Section G Development Standards, 2 "Screening" and 3 "Skyline."

Section 2 states in part, *"[s]creening... visible from residential properties...shall be screened or camouflaged to mitigate adverse visual impacts."* We see no provision for the screening or camouflage of the monopole tower as presented.

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Section 3 says that the "... [f]acilities shall not adversely affect public views of skylines or **skyline views from other properties...**" [Emphasis added] By the documentation and photos provided we believe that the skyline will be obstructed from our property as required. Please see attached photos taken from our property.

Our third and final concern is set at 19.48.150, Section F Application Requirements, 3, regarding RF (Radio Frequency) Requirements.

This section says in part that the report "...shall include estimates of the maximum electric and magnetic field strength at the edge of the facility site, the extent that measurable fields extend in all directions from the facility." Our residence is at or near the same elevation as the panel-type antennas proposed by this application. The FCC website states that: "[c]onsequently, normal ground-level exposure is much less than the exposure that might be encountered if one were very close to the antenna and in its main transmitted beam." (See: www.fcc.gov/guides/human-exposure-rf-fields-guidelines-cellular-and-pcs-sites) And in our review of the "Waterford Radio Frequency Emissions Compliance Report For Verizon Wireless" we have growing concern for ourselves and our guests on our property. Because on page two under "Analysis" the report states: "The panel-type antennas to be employed at this site are highly directional by design and the orientation in azimuth and mounting elevation, as documented, **serve to reduce the potential to exceed MPE limits at any location other than directly in front of the antennas.**" [Emphasis added] Our property and residence will be in front of at least one of the twelve antennas pointing to the horizon, at or about the same mounting elevation, the beam will be piercing through our home. Therefore the Maximum Permissible Exposure (MPE) limits are likely to be exceeded.

The FCC website and the Waterford report both are telling us that our exposure could seriously exceed FCC requirements. The Waterford report states that "... at the antenna level, the maximum predicted power density level resulting from all Verizon Wireless operations is 59.228% of the FCC Occupational limit (**296.1% of the General Population limits**)." [Emphasis added] This excess power density level at the antenna beam height exceeds the General Population limit by 296.1%. So at ground level Waterford states the predicted power density level is 1.008% and at the antenna transmission beam it is 296.1%, our home is at the antenna transmission beam elevation and our property is approximately 1,100 feet from proposed monopole.

The terms "close" and "directly in front" are vague terms to understand in this situation. How far do the beams from the 12 proposed antennas reach? What are the degrees in the antenna beam width? At what point in the width and length of the beams do the Limits for General Population exceed the Maximum Permissible Exposure (MPE) limits? To our understanding the horizontal pattern of the 12 antenna is a complete 365° circumference. Some existing cell antenna beam widths can reach 66° in height. Some cell base towers can emit 12 to 22 miles depending on geography. Our property is close and directly in front of the proposed antenna beam(s) at around .218 miles. The Waterford report did not take into account our

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circumstances and have failed to prove their proposed tower to be within FCC requirements.

There are numerous other elevated residences within the proposed antenna beam elevation. There were no "Photo Simulations" submitted as required from neighboring properties nor any data regarding the "... measurable fields extend[ing] in all directions from the facility" [Added text] for visual or FCC compliant safety requirements. The proponents have failed to prove that their tower is safe or within the safety requirements for the proposed tower location.

We have addressed our concerns with the recommendations in the Commercial Wireless Service Facilities Code, the FCC recommendations, and the Waterford report. We are additionally concerned about the effects of living directly in the proposed towers antenna main transmission beam for a considerable stationary period of time and on a daily basis. We are incorporating by reference the entire "INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS, DIVISION OF OCCUPATIONAL HEALTH, SAFETY AND MEDICINE, position on the Health Effects from Radio Frequency/Microwave (RF/MW) Radiation in Fire Department Facilities from Base Stations for Antennas and Towers for the Conduction of Cell Phone Transmissions" together with its resources for the position in this response. (See: <http://iaff.org/hs/facts/celltowerfinal.asp#n49>) The IAFF opposed "...the use of fire stations as base stations for towers and/or antennas for the conduction of cell phone transmissions until a study with the highest scientific merit and integrity on health effects of exposure to low-intensity RF/MW radiation is conducted and it is proven that such sitings are not hazardous to the health of our members." They state "[s]pecifically, there is concern for the effects of radio frequency radiation on the central nervous system (CNS) and the immune system, as well as other metabolic effects observed in preliminary studies." The U.S. Environmental Protection Agency stated in a July 16, 2002, letter, "Federal health and safety agencies have not yet developed policies concerning possible risk from long-term, non-thermal exposures. The FCC's exposure guideline is considered protective of effects arising from a thermal mechanism **[RF radiation from cell towers in non-thermal]** but not from all possible mechanisms. Therefore, the generalization by many that the guidelines protecting human beings from harm by any or all mechanisms is not justified." [Added text] We prefer consideration of prudent avoidance for health effects for which evidence is less than conclusive. Questions concerning the health effects and safety of RF radiation remain. While scientist investigate the health hazard of low intensity RF exposure, we do not want to be exposed to the serious health hazards that this radiation exposes and at antenna beam levels.

As an additional request we have the inalienable rights of life, liberty and the pursuit of happiness, stated in the Declaration of Independence, and restated in the 14th Amendment; we do not want our inalienable rights of life, liberty or happiness abrogated. Including but not limited to our health, property value (economic impact of a cell tower in close proximity), and enjoyment of our life and property. Please give this your utmost consideration.

In summary, we have noted that the aesthetic considerations, screening and skyline requirements are deficient to the development standards in the Planning Department notice. And most importantly the Radio Frequency requirements are of serious concern. Because, while most towers are elevated above ground levels limiting exposure to the tower Radio Frequencies, the proposed tower is at the elevation of our home and living/sleeping area. The FCC and the Waterford report both state that the elevated exposure to the antenna and in its main transmitting beam increases exposure to RF/microwave safety standards. We ask that the Amador County Planning Director consider denying this permit based on the facts set forth in this response. It would be unsafe for the tower to be erected as proposed with the uncertainty of the health and safety effects of low intensity Radio Frequency exposure at unknown or any level.

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Thank you.

Elton and Laura Allred

Attachments:

INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS, DIVISION OF OCCUPATIONAL HEALTH, SAFETY AND MEDICINE, position on the Health Effects from Radio Frequency/Microwave (RF/MW) Radiation in Fire Department Facilities from Base Stations for Antennas and Towers for the Conduction of Cell Phone Transmissions

Source: <http://iaff.org/hs/facts/celltowerfinal.asp#n49>

Photos of skyline (north view and east view) of the proposed site from our residential property



AMADOR COUNTY COMMUNITY DEVELOPMENT AGENCY
PLANNING DEPARTMENT

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COUNTY ADMINISTRATION CENTER • 810 COURT STREET • JACKSON, CA 95642-2132

The Amador County Planning Department has received the following **Commercial Wireless Service Facility** application:

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Applicant: Epic Wireless Group, LLC / Verizon Wireless

Assessor's Parcel Number: 015-020-016

Location: 19580 American Flat Side Road, approximately one mile south of Fiddletown Road in the Fiddletown area (see map on reverse and attached photo-simulation).

Type of Commercial Wireless Service Facility: 50' monopole tower with twelve (12) panel wireless antennae, a 30 Kilowatt generator, and related ground-mounted electrical cabinets all located within a 30' x 16' area surrounded by a 6-foot-tall chain-link fence.

Date to be Issued: July 10, 2015

County Code requires that notification of this application be sent to affected landowners no less than a distance of 300 feet in all directions from the subject parcel. If opposition to the permit application is expressed by area landowners within 10 days of the mail-out (see "Date of this Notice" below) or the Planning Director finds the application does not meet the requirements of County Code Section 19.48.150(D) (attached), then the Planning Director may deny the permit.

If you have any questions or desire more information concerning this application, feel free to contact this office.

Amador County Planning Department
Date of this Notice: June 24, 2015

Attachments: Photosimulation
County Code Section 19.48.150

cc: Amador Air District
Building Department
Environmental Health Department
Public Works Agency

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'Auth/Index?ReturnUrl=%2Fhs%2Ffacts%2Fcelltowerfinal.asp%23n49)

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INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS
DIVISION OF OCCUPATIONAL HEALTH, SAFETY AND MEDICINE

Position on the Health Effects from Radio Frequency/Microwave (RF/MW) Radiation in Fire Department Facilities from Base Stations for Antennas and Towers for the Conduction of Cell Phone Transmissions

The International Association of Fire Fighters' position on locating cell towers commercial wireless infrastructure on fire department facilities, as adopted by its membership in August 2004 ⁽¹⁾, is that the IAFF oppose the use of fire stations as base stations for towers and/or antennas for the conduction of cell phone transmissions until a study with the highest scientific merit and integrity on health effects of exposure to low-intensity RF/MW radiation is conducted and it is proven that such sitings are not hazardous to the health of our members.

Further, the IAFF is investigating funding for a U.S. and Canadian study that would characterize exposures from RF/MW radiation in fire houses with and without cellular antennae, and examine the health status of the fire fighters as a function of their assignment in exposed or unexposed fire houses. Specifically, there is concern for the effects of radio frequency radiation on the central nervous system (CNS) and the immune system, as well as other metabolic effects observed in preliminary studies.

It is the belief of some international governments and regulatory bodies and of the wireless telecommunications industry that no consistent increases in health risk exist from exposure to RF/MW radiation unless the intensity of the radiation is sufficient to heat body tissue. However, it is important to note that these positions are based on non-continuous exposures to the general public to low intensity RF/MW radiation emitted from wireless telecommunications base stations. Furthermore, most studies that are the basis of this position are at least five years old and generally look at the safety of the phone itself. IAFF members are concerned about the effects of living directly under these antenna base stations for a considerable stationary period of time and on a daily basis. There are established biological effects from exposure to low-level RF/MW radiation. Such biological effects are recognized as markers of adverse health effects when they arise from exposure to toxic chemicals for example. The IAFF's efforts will attempt to establish whether there is a correlation between such biological effects and a health risk to fire fighters and emergency medical personnel due to the siting of cell phone antennas and base stations at fire stations and facilities where they work.

Background

Critical questions concerning the health effects and safety of RF/MW radiation remain. Accordingly, should we allow exposure of our fire fighters and emergency medical personnel to this radiation to continue for the next twenty years when there is ongoing controversy over many aspects of RF/MW health effects? While no one disagrees that serious health hazards occur when living cells in the body are heated as happens with high intensity RF/MW exposure (just like in a microwave oven), scientists are currently investigating the health hazards of low intensity RF/MW exposure. Low intensity RF/MW exposure is exposure which does not raise the temperature of the living cells in the body.

Additionally, a National Institute of Environmental Health Sciences panel designated power frequency electromagnetic fields (ELF/EMF) as "possible human carcinogens." ⁽²⁾ In March 2002 The International Association on Research on Cancer of the World Health Organization also assigned this designation to ELF/EMF in Volume 80 of its *IARC Monographs on the Evaluation of Carcinogenic Risks to Humans*. ⁽³⁾

Fixed antennas used for wireless telecommunications are referred to as cellular base stations, cell stations, PCS ("Personal Communications Service") stations or telephone transmission towers. These base stations consist of antennas and electronic equipment. Because the antennas need to be high in the air, they are often located on towers, poles, water tanks, or rooftops. Typical heights for freestanding base station towers are 50-200 feet.

Some base stations use antennas that look like poles, 10 to 15 feet in length, that are referred to as "omni-directional" antennas. These types of antennas are usually found in rural areas. In urban and suburban areas wireless providers now more commonly use panel or sector antennas for their base stations. These antennas consist of rectangular panels, about 1 by 4 feet in dimension. The antennas are usually arranged in three groups of three antennas each. One antenna in each group is used to transmit signals to wireless phones, and the other two antennas in each group are used to receive signals from wireless phones.

At any base station site, the amount of RF/MW radiation produced depends on the number of radio channels (transmitters) per antenna and the power of each transmitter. Typically, 21 channels per antenna sector are available. For a typical cell site using sector antennas, each of the three transmitting antennas could be connected to up to 21 transmitters for a total of 63 transmitters. When omni-directional antennas are used, a cellular base station could theoretically use up to 96 transmitters. Base stations used for PCS communications generally require fewer transmitters than those used for cellular radio transmissions, since PCS carriers usually have a higher density of base station antenna sites.

The electromagnetic RF/MW radiation transmitted from base station antennas travel toward the horizon in relatively narrow paths. The individual pattern for a single array of sector antennas is wedge-shaped, like a piece of pie. Cellular and PCS base stations in the United States are required to comply with limits for exposure recommended by expert organizations and endorsed by government agencies responsible for health and safety. When cellular and PCS antennas are mounted on rooftops, RF/MW radiation levels on that roof or on others near by would be greater than those typically encountered on the ground.

The telecommunications industry claims cellular antennas are safe because the RF/MW radiation they produce is too weak to cause heating, i.e., a "thermal effect." They point to "safety standards" from groups such as ANSI/IEEE or ICNIRP to support their claims. But these groups have explicitly stated that their claims of "safe RF/MW radiation exposure is harmless" rest on the fact that it is too weak to produce a rise in body temperature, a "thermal effect."

There is a large body of internationally accepted scientific evidence which points to the existence of non-thermal effects of RF/MW radiation. The issue at the present time is not whether such evidence exists, but rather what weight to give it.

Internationally acknowledged experts in the field of RF/MW radiation research have shown that RF/MW transmissions of the type used in digital cellular antennas and phones can have critical effects on cell cultures animals, and people in laboratories and have also found epidemiological evidence (studies of communities, not in the laboratory) of serious health effects at "non-thermal levels," where the intensity of the RF/MW radiation was too low to cause heating. They have found:

- Increased cell growth of brain cancer cells ⁽⁵⁾
- A doubling of the rate of lymphoma in mice ⁽⁶⁾
- Changes in tumor growth in rats ⁽⁷⁾
- An increased number of tumors in rats ⁽⁸⁾
- Increased single- and double-strand breaks in DNA, our genetic material ⁽⁹⁾
- 2 to 4 times as many cancers in Polish soldiers exposed to RF ⁽¹⁰⁾
- More childhood leukemia in children exposed to RF ⁽¹¹⁾
- Changes in sleep patterns and REM type sleep ⁽¹²⁾
- Headaches caused by RF/MW radiation exposure ⁽¹³⁾
- Neurologic changes ⁽¹⁴⁾ including:
 - Changes in the blood-brain-barrier ⁽¹⁵⁾
 - Changes in cellular morphology (including cell death) ⁽¹⁶⁾
 - Changes in neural electrophysiology (EEG) ⁽¹⁷⁾
 - Changes in neurotransmitters (which affect motivation and pain perception) ⁽¹⁸⁾
 - Metabolic changes (of calcium ions, for instance) ⁽¹⁹⁾
 - Cytogenetic effects (which can affect cancer, Alzheimer's, neurodegenerative diseases) ⁽²⁰⁾
- Decreased memory, attention, and slower reaction time in school children ⁽²¹⁾
- Retarded learning in rats indicating a deficit in spatial "working memory" ⁽²²⁾

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- Increased blood pressure in healthy men ⁽²³⁾
- Damage to eye cells when combined with commonly used glaucoma medications ⁽²⁴⁾

Many national and international organizations have recognized the need to define the true risk of low intensity non-thermal RF/MW radiation exposure, calling for intensive scientific investigation to answer the open questions. These include:

- The World Health Organization, noting reports of "cancer, reduced fertility, memory loss, and adverse changes in the behavior and development of children." ⁽²⁵⁾
- The U. S. Food and Drug Administration (FDA) ⁽²⁶⁾
- The International Agency for Research on Cancer (IARC) ⁽²⁷⁾
- The Swedish Work Environmental Fund ⁽²⁸⁾
- The National Cancer Institute (NCI) ⁽²⁹⁾
- The European Commission (EC) ⁽³⁰⁾
- New Zealand's Ministry of Health ⁽³¹⁾
- National Health and Medical Research Council of Australia ⁽³²⁾
- Commonwealth Scientific Industrial Research Organization of Australia (CSIRO) ⁽³³⁾
- The Royal Society of Canada expert group report prepared for Health Canada ⁽³⁴⁾
- European Union's REFLEX Project (Risk Evaluation of Potential Environmental Hazards from Low Frequency Electromagnetic Field Exposure Using Sensitive *in vitro* Methods) ⁽³⁵⁾
- The Independent Group on Electromagnetic Fields of the Swedish Radiation Protection Board (SSI) ⁽³⁶⁾
- The United Kingdom's National Radiological Protection Board (NRPB) ⁽³⁷⁾
- The EMF-Team Finland's Helsinki Appeal 2005 ⁽³⁸⁾

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Non-thermal effects are recognized by experts on RF/MW radiation and health to be potential health hazards. Safe levels of RF/MW exposure for these low intensity, non-thermal effects have not yet been established.

The FDA has explicitly rejected claims that cellular phones are "safe." ⁽³⁹⁾

The Environmental Protection Agency (EPA) has stated repeatedly that the current (ANSI/IEEE) RF/MW safety standards protect only against thermal effects. ⁽⁴⁰⁾

Many scientists and physicians question the safety of exposure to RF/MW radiation. The CSIRO study, for example, notes that there are no clear cutoff levels at which low intensity RF/MW exposure has no effect, and that the results of ongoing studies will take years to analyze. ⁽⁴¹⁾

Internationally, researchers and physicians have issued statements that biological effects from low-intensity RF/MW radiation exposure are scientifically established:

- The 1998 Vienna-EMF Resolution ⁽⁴²⁾
- The 2000 Salzburg Resolution on Mobile Telecommunication Base Stations ⁽⁴³⁾
- The 2002 Catania Resolution ⁽⁴⁴⁾
- The 2002 Freiburger Appeal ⁽⁴⁵⁾
- The 2004 Report of the European Union's REFLEX Project (Risk Evaluation of Potential Environmental Hazards from Low Frequency Electromagnetic Field Exposure Using Sensitive *in vitro* Methods) ⁽⁴⁶⁾
- The 2004 Second Annual Report from Sweden's Radiation Protection Board (SSI) Independent Expert Group on Electromagnetic Fields Recent Research on Mobile Telephony and Health Risks ⁽⁴⁷⁾
- Mobile Phones and Health 2004: Report by the Board of NRPB (The UK's National Radiological Protection Board) ⁽⁴⁸⁾

The county of Palm Beach, Florida, the City of Los Angeles, California, and the country of New Zealand have all prohibited cell phone base stations and antennas near schools due to safety concerns. The British Columbia Confederation of Parent Advisory Councils [BCCPAC] passed a resolution in 2003 banning cellular antennae from schools and school grounds. This organization is comparable to the Parent Teachers Association (PTA) in the United States. The resolution was directed to B.C. Ministry of Education, B.C. Ministry of Children and Family Development, B.C. School Trustees Association, and B.C. Association of Municipalities.

US Government Information

In the United States, the Federal Communications Commission (FCC) has used safety guidelines for RF/MW radiation environmental exposure since 1985.

The FCC guidelines for human exposure to RF/MW radiation are derived from the recommendations of two organizations, the National Council on Radiation Protection and Measurements (NCRP) and the Institute of Electrical and Electronics Engineers (IEEE). In both cases, the recommendations were developed by scientific and engineering experts drawn from industry, government, and academia after extensive reviews of the scientific literature related to the biological effects of RF/MW radiation.

Many countries in Europe and elsewhere use exposure guidelines developed by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). The ICNIRP safety limits are generally similar to those of the NCRP and IEEE, with a few exceptions. For example, ICNIRP recommends different exposure levels in the lower and upper frequency ranges and for localized exposure from certain products such as hand-held wireless telephones. Currently, the World Health Organization is working to provide a framework for international harmonization of RF/MW radiation safety standards.

In order to affirm conformity to standards regarding heating of tissue, measurements are time averaged over 0.1 hours [6 minutes]. This method eliminates any spikes in the readings. Computer power bars have surge protectors to prevent damage to computers. **Fire fighters and emergency medical personnel do not!**

The NCRP, IEEE, and ICNIRP all have identified a whole-body Specific Absorption Rate (SAR) value of 4 watts per kilogram (4 W/kg) as a threshold level of exposure at which harmful biological thermal effects due to tissue heating may occur. Exposure guidelines in terms of field strength, power density and localized SAR were then derived from this threshold value. In addition, the NCRP, IEEE, and ICNIRP guidelines vary depending on the frequency of the RF/MW radiation exposure. This is due to the finding that whole-body human absorption of RF/MW radiation varies with the frequency of the RF signal. The most restrictive limits on whole-body exposure are in the frequency range of 30-300 MHz where the human body absorbs RF/MW energy most efficiently. For products that only expose part of the body, such as wireless phones, exposure limits in terms of SAR only are specified.

Similarly, the exposure limits used by the FCC are expressed in terms of SAR, electric and magnetic field strength and power density for transmitters operating at frequencies from 300 kHz to 100 GHz. The specific values can be found in two FCC bulletins, OET Bulletins 56 and 65.

OET Bulletin 56, *"Questions and Answers about Biological Effects and Potential Hazards of Radiofrequency Electromagnetic Fields"* was designed to provide factual information to the public by answering some of the most commonly asked questions. It includes the latest information on FCC guidelines for human exposure to RF/MW radiation. Further information and a downloadable version of Bulletin 56 can be found at: <http://www.fcc.gov/oet/info/documents/bulletins/#56> (<http://www.fcc.gov/oet/info/documents/bulletins/#56>)

OET Bulletin 65, *"Evaluating Compliance With FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields"* was prepared to provide assistance in determining whether proposed or existing transmitting facilities, operations or devices comply with limits for human exposure to RF/MW radiation adopted by the Federal Communications Commission (FCC). Further information and a downloadable version of Bulletin 65 can be found at: <http://www.fcc.gov/oet/info/documents/bulletins/#65> (<http://www.fcc.gov/oet/info/documents/bulletins/#65>)

The FCC authorizes and licenses products, transmitters, and facilities that generate RF and microwave radiation. It has jurisdiction over all transmitting services in the U.S. except those specifically operated by the Federal Government. Under the National Environmental Policy Act of 1969 (NEPA), the FCC has certain responsibilities to consider whether its actions will significantly affect the quality of the human environment. Therefore, FCC approval and licensing of transmitters and facilities must be evaluated for significant impact on the environment. Human exposure to RF radiation emitted by FCC-regulated transmitters is one of several factors that must be considered in such environmental evaluations. In 1996, the FCC revised its guidelines for RF/MW radiation exposure as a result of a multi-year proceeding and as required by the Telecommunications Act of 1996.

For further information and answers to questions about the safety of RF/MW radiation from transmitters and facilities regulated by the FCC go to <http://www.fcc.gov/oet/rfsafety/rf-faqs.html> (<http://www.fcc.gov/oet/rfsafety/rf-faqs.html>).

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Canadian Government Information

Industry Canada is the organization that sets regulatory requirements for electromagnetic spectrum management and radio equipment in Canada. Industry Canada establishes standards for equipment certification and, as part of these standards, developed RSS-102, which specifies permissible radiofrequency RF/MW radiation levels. For this purpose, Industry Canada adopted the limits outlined in Health Canada's Safety-Code 6, which is a guideline document for limiting RF exposure. A downloadable version of "RSS-102 - Evaluation Procedure for Mobile and Portable Radio Transmitters with respect to Health Canada's Safety Code 6 for Exposure of Humans to Radio Frequency Fields", as well as additional information can be found at: [http://strategis.ic.gc.ca/epic/internet/insmt-gst.nsf/vwapj/rss102.pdf/\\$FILE/rss102.pdf](http://strategis.ic.gc.ca/epic/internet/insmt-gst.nsf/vwapj/rss102.pdf/$FILE/rss102.pdf) ([http://strategis.ic.gc.ca/epic/internet/insmt-gst.nsf/vwapj/rss102.pdf/\\$FILE/rss102.pdf](http://strategis.ic.gc.ca/epic/internet/insmt-gst.nsf/vwapj/rss102.pdf/$FILE/rss102.pdf))

Safety Code 6 specifies the requirements for the use of radiation emitting devices. This Code replaces the previous Safety Code 6 - EHD-TR-160. A downloadable version of "Limits of Human Exposure to Radiofrequency Electromagnetic Fields in the Frequency Range from 3 kHz TO 300 GHz – Safety Code 6", as well as further detailed information can be found at <http://www.hc-sc.gc.ca/hecs-sesc/ccrpb/publication/99ehd237/toc.htm> (<http://www.hc-sc.gc.ca/hecs-sesc/ccrpb/publication/99ehd237/toc.htm>).

US and Canadian Legal Issues

Although some local and state governments have enacted rules and regulations about human exposure to RF/MW radiation in the past, the Telecommunications Act of 1996 requires the United States Federal Government to control human exposure to RF/MW radiation. In particular, Section 704 of the Act states that, "No State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission's regulations concerning such emissions." Further information on federal authority and FCC policy is available in a fact sheet from the FCC's Wireless Telecommunications Bureau at www.fcc.gov/wtb (<http://www.fcc.gov/wtb>).

In a recent opinion filed by Senior Circuit Judge Stephen F. Williams, No. 03-1336 *EMR Network v. Federal Communications Commission and United States of America*, the Court upheld the FCC's decision not to initiate an inquiry on the need to revise its regulations to address non-thermal effects of radiofrequency (RF) radiation from the facilities and products subject to FCC regulation as EMR Network had requested in its September 2001 Petition for Inquiry.

At the request of the EMR Network, the EMR Policy Institute provided legal and research support for this appeal. On January 13, 2005, a Petition for Rehearing *en banc* by the full panel of judges at the DC Circuit Court of Appeals was filed. Briefs, background documents and the DC Circuit decision are found at http://www.emrpolicy.org/litigation/case_law/index.htm (http://www.emrpolicy.org/litigation/case_law/index.htm).

The Toronto Medical Officer of Health for the Toronto Board of Health recommended to Health Canada that public exposure limits for RF/MW radiation be made 100 times stricter; however the recommendation was not allowed since, as in the US, only the Canadian federal government can regulate RF/MW radiation exposure level.

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World Health Organization Efforts

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In 1996, the World Health Organization (WHO) established the International EMF Project to review the scientific literature and work towards resolution of health concerns over the use of RF/MW technology. WHO maintains a Web site that provides additional information on this project and about RF/MW biological effects and research. For further information go to <http://www.who.int/peh-emf/en/> (<http://www.who.int/peh-emf/en/>).

Conclusion

For decades, the International Association of Fire Fighters has been directly involved in protecting and promoting the health and safety of our membership. However, we simply don't know at this time what the possible health consequences of long-term-exposure to low-intensity RF/MW radiation of the type used by the cell phone base stations and antennas will be. No one knows--the data just aren't there. The chairman of the International

Commission on Non-Ionizing Radiation Protection ICNIRP), one of the leading international organizations which formulated the current RF/MW radiation exposure guidelines, has stated that the guidelines include "no consideration regarding prudent avoidance" for health effects for which evidence is less than conclusive⁽⁴⁹⁾

Again, fire department facilities, where fire fighters and emergency response personnel live and work are not the proper place for a technology which could endanger their health and safety

The only reasonable and responsible course is to conduct a study of the highest scientific merit and integrity on the RF/MW radiation health effects to our membership and, in the interim, oppose the use of fire stations as base stations for towers and/or antennas for the conduction of cell phone transmissions until it is proven that such sitings are not hazardous to the health of our members.

Footnotes

[back] 1. **Revised and Amended IAFF Resolution No. 15; August 2004**

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Study of Firefighters Exposed to Radio Frequency (RF) Radiation from Cell Towers/Masts

WHEREAS, fire stations across the United States and Canada are being sought by wireless companies as base stations for the antennas and towers for the conduction of cell phone transmissions; and

WHEREAS, many firefighters who are living with cell towers on or adjacent to their stations are paying a substantial price in terms of physical and mental health. As first responders and protectors of the general public, it is crucial that firefighters are functioning at optimal cognitive and physical capacity at all times; and

WHEREAS, the brain is the first organ to be affected by RF radiation and symptoms manifest in a multitude of neurological conditions including migraine headaches, extreme fatigue, disorientation, slowed reaction time vertigo, vital memory loss and attention deficit amidst life threatening emergencies; and

WHEREAS, most of the firefighters who are experiencing symptoms can attribute the onset to the first week(s) these towers/antennas were activated; and

WHEREAS, RF radiation is emitted by these cellular antennas and RF radiation can penetrate every living cell including plants, animals and humans; and

WHEREAS, both the U. S. and Canadian governments established regulatory limits for RF radiation based on thermal (heat) measurements with no regard for the adverse health effects from non-thermal radiation which is proven to harm the human brain and immune system; and

WHEREAS, the U. S. Environmental Protection Agency stated in a July 16, 2002, letter, "Federal health and safety agencies have not yet developed policies concerning possible risk from long-term, non-thermal exposures. The FCC's exposure guideline is considered protective of effects arising from a thermal mechanism (RF radiation from cell towers is non-thermal) but not from all possible mechanisms. Therefore, the generalization by many that the guidelines protecting human beings from harm by any or all mechanisms is not justified"; and

WHEREAS, an Expert Panel Report requested by the Royal Society of Canada prepared for Health Canada (1999) stated that, "Exposure to RF fields at intensities far less than levels required to produce measurable heating can cause effects in cells and tissues. These biological effects include alterations in the activity of the enzyme ornithine decarboxylase, in calcium regulation, and in the permeability of the blood-brain barrier. Some of these biological effects brought about by non-thermal exposure levels of RF could potentially be associated with adverse health effects"; and

WHEREAS, based on concerns over growing scientific evidence of dangers from RF radiation, an international conference was convened in Salzburg, Austria, in the summer of 2000 where renowned scientists declared the upper-most RF radiation exposure limit from a tower-mast should be 1/10th of 1 microwatt (Note that 1/10th of 1 microwatt is 10,000 times lower than the uppermost limit allowed by the U. S. or Canada.); and it should be noted this limit was set because of study results showing brain wave changes at 1/10th of 1 microwatt; and

WHEREAS, in a recently cleared paper by Dr. Richard A. Albanese of the U. S. Air Force, a highly recognized physician in the area of the impact of radiation on the human body, Dr. Albanese states, "I would ask a good faith effort in achieving as low exposure rates as are possible within reasonable financial constraints. Also I would func

targeted studies using animal subjects and human groups living or working in high radiation settings or heavy cellular phone users, emphasizing disease causations. I urge acceptance of the ideal that there should be no unmonitored occupational or environmental exposures whose associated disease rates are unknown." (The opinions expressed herein are those of Dr. Albanese, and do not reflect the policies of the United States Air Force.); and

WHEREAS, recently a study, not affiliated with the wireless industry, was conducted of firefighters exposed to RF radiation from cell towers/antennas affixed to their stations.** The study revealed brain damage that can be differentiated from chemical causation (such as inhalation of toxic smoke) suggesting RF radiation as the cause of the brain damage found on SPECT scans; and

WHEREAS, firefighters are the protectors of people and property and should be protected under the Precautionary Principle of Science and therefore, unless radiation is proven safe and harmless, cellular antennas should not be placed on or near fire stations; therefore be it

RESOLVED, That the IAFF shall seek funding for an initial U. S. and Canadian study with the highest scientific merit and integrity, contrasting firefighters with residence in stations with towers to firefighters without similar exposure; and be it further

RESOLVED, That in accordance with the results of the study, the IAFF will establish protective policy measures with the health and safety of all firefighters as the paramount objective; and be it further

RESOLVED, That the IAFF oppose the use of fire stations as base stations for antennas and towers for the conduction of cell phone transmissions until such installations are proven not to be hazardous to the health of our members.

**Note: A pilot study was conducted in 2004 of six California fire fighters working and sleeping in stations with towers. The study, conducted by Gunnar Heuser, M.D., PhD. of Agoura Hills, CA, focused on neurological symptoms of six fire fighters who had been working for up to five years in stations with cell towers. Those symptoms included slowed reaction time, lack of focus, lack of impulse control, severe headaches, anesthesia-like sleep, sleep deprivation, depression, and tremors. Dr. Heuser used functional brain scans - SPECT scans - to assess any changes in the brains of the six fire fighters as compared to healthy brains of men of the same age. Computerized psychological testing known as TOVA was used to study reaction time, impulse control, and attention span. The SPECT scans revealed a pattern of abnormal change which was concentrated over a wider area than would normally be seen in brains of individuals exposed to toxic inhalation, as might be expected from fighting fires. Dr. Heuser concluded the only plausible explanation at this time would be RF radiation exposure. Additionally, the TOVA testing revealed among the six fire fighters delayed reaction time, lack of impulse control and difficulty in maintaining mental focus.

[back] 2. An international blue ribbon panel assembled by the National Institute of Environmental Health Sciences (NIEHS) designated power frequency electromagnetic fields (EMF) as "possible human carcinogens" on June 24 1998. The panel's decision was based largely on the results of epidemiological studies of children exposed at home and workers exposed on the job. The evaluation of the EMF literature followed procedures developed by the International Agency for Research on Cancer (IARC), based in Lyon, France. The working group's report will be the basis for the NIEHS report to Congress on the EMF Research and Public Information Dissemination program (EMF RAPID). The National Radiological Protection Board (NRPB) of the United Kingdom noted that the views of its Advisory Group on Non-Ionizing Radiation are "consistent with those of the NIEHS expert panel."

June 26, 1998 statement of the National Radiological Protection Board, cited in Microwave News, July/August 1998

[back] 3. *World Health Organization; International Agency for Research on Cancer; IARC Monographs on the Evaluation of Carcinogenic Risks to Humans; Volume 80 Non-Ionizing Radiation, Part 1: Static and Extremely Low-Frequency (ELF) Electric and Magnetic Fields 2002; 429 pages; ISBN 92 832 1280 0; See <http://www-cie.iarc.fr/htdocs/monographs/vol80/80>. (<http://www-cie.iarc.fr/htdocs/monographs/vol80/80.html>) This IARC Monograph provides the rationale for its designation of ELF/EMF as a possible human carcinogen. It states that:*

A few studies on genetic effects have examined chromosomal aberrations and micronuclei in lymphocytes from workers exposed to ELF electric and magnetic fields. In these studies, confounding by genotoxic agents (tobacco, solvents) and comparability between the exposed and control groups are of concern. Thus, the studies reporting an increased frequency of chromosomal aberrations and micronuclei are difficult to interpret.

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Many studies have been conducted to investigate the effects of ELF magnetic fields on various genetic end-points. Although increased DNA strand breaks have been reported in brain cells of exposed rodents, the results are inconclusive; most of the studies show no effects in mammalian cells exposed to magnetic fields alone at levels below 50 μ T. However, extremely strong ELF magnetic fields have caused adverse genetic effects in some studies. In addition, several groups have reported that ELF magnetic fields enhance the effects of known DNA- and chromosome-damaging agents such as ionizing radiation.

The few animal studies on cancer-related non-genetic effects are inconclusive. Results on the effects on in-vitro cell proliferation and malignant transformation are inconsistent, but some studies suggest that ELF magnetic fields affect cell proliferation and modify cellular responses to other factors such as melatonin. An increase in apoptosis following exposure of various cell lines to ELF electric and magnetic fields has been reported in several studies with different exposure conditions. Numerous studies have investigated effects of ELF magnetic fields on cellular end-points associated with signal transduction, but the results are not consistent.

[back] 4. The International Commission on Non-Ionizing Radiation Protection (ICNIRP) statement "Health Issues Related to the Use of Hand-Held Radiotelephones and Base Transmitters" of 1996 reads:

"Thermally mediated effects of RF fields have been studied in animals, including primates. These data suggest effects that will probably occur in humans subjected to whole body or localized heating sufficient to increase tissue temperatures by greater than 1C. They include the induction of opacities of the lens of the eye, possible effects on development and male fertility, various physiological and thermoregulatory responses to heat, and a decrease in ability to perform mental tasks as body temperature increases. Similar effects have been reported in people subjected to heat stress, for example while working in hot environments or by fever. The various effects are well established and form the biological basis for restricting occupational and public exposure to radiofrequency fields. In contrast non-thermal effects are not well established and currently do not form a scientifically acceptable basis for restricting human exposure for frequencies used by hand-held radiotelephones and base stations."

International Commission on Non-Ionizing Radiation Protection, "Health Issues Related to the Use of Hand-Held Radiotelephones and Base Transmitters," Health Physics 70:587-593, 1996

The ANSI/IEEE Standard for Safety Levels of 1992 similarly states:

"An extensive review of the literature revealed once again that the most sensitive measurements of potentially harmful biological effects were based on the disruption of ongoing behavior associated with an increase of body temperature in the presence of electromagnetic fields. Because of the paucity of reliable data on chronic exposures, IEEE Subcommittee IV focused on evidence of behavioral disruption under acute exposures, even disruption of a transient and fully reversible nature."

IEEE Standards Coordinating committee 28 on Non-Ionizing Radiation Hazards: Standard for Safe Levels With Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 KHz to 300 GHz (ANSI/IEEE C95.1-1991), The Institute of Electrical and Electronics Engineers, New York, 1992.

[back] 5. Drs. Czerska, Casamento, Ning, and Davis (working for the Food and Drug Administration in 1997) using "a waveform identical to that used in digital cellular phones" at a power level within our current standards (SAR of 1.6 W/Kg, the maximum spatial peak exposure level recommended for the general population in the ANSI C95.1-1991 standard) found increases in cellular proliferation in human glioblastoma cells. This shows that "acceptable" levels of radiation can cause human cancer cells to multiply faster. The authors note that "because of reported associations between cellular phone exposure and the occurrence of a brain tumor, glioblastoma, a human glioblastoma cell line was used" in their research.

E.M. Czerska, J. Casamento, J. T. Ning, and C. Davis, "Effects of Radiofrequency Electromagnetic Radiation on Cell Proliferation," [Abstract presented on February 7, 1997 at the workshop 'Physical Characteristics and Possible Biological Effects of Microwaves Applied in Wireless Communication, Rockville, MD] E. M. Czerska, J. Casamento, Centers for Devices and Radiological Health, Food and Drug Administration, Rockville, Maryland 20857, USA; H. T. Ning, Indian Health Service, Rockville, Maryland 20857, USA; C. Davis, Electrical Engineering Dept., Univ. of Maryland, College Park, Maryland 20742, USA

[back] 6. Dr. Michael Repacholi (in 1997, currently the director of the International Electromagnetic Fields Project at the World Health Organization) took one hundred transgenic mice and exposed some to radiation for two 3C

minute periods a day for up to 18 months. He found that the exposed mice developed lymphomas (a type of cancer) at twice the rate of the unexposed mice. While telecommunications industry spokespersons criticized the experiment for using mice with a mutation which predisposed them to cancer (transgenic) the researchers pointed out that "some individuals inherit mutations in other genes...that predispose them to develop cancer, and these individuals may comprise a subpopulation at special risk from agents that would pose an otherwise insignificant risk of cancer."

Dr. Repacholi stated "I believe this is the first animal study showing a true non-thermal effect." He repeated the experiment in 1998 using 50 Hz fields instead of the 900 MHz pulsed radiation (the type used by cellular phones) used in the original experiment and found no cancer risk. He stated that this new data had implications for his original cellular phone study: "the control groups for both our RF and 50 Hz field studies showed no statistical differences, which lessens the possibility that the RF/MW radiation study result was a chance event or due to errors in methodology."

It is extremely important to note that Dr. Michael Repacholi was Chairman of the ICNIRP at the time its Statement on Health Issues Related to the Use of Hand-Held Radiotelephones and Base Transmitters was developed in 1996.

M. Repacholi et al., "Lymphomas in Eμ-Pim1 Transgenic Mice Exposed to Pulsed 900 MHz Electromagnetic Fields," Radiation Research, 147, pp.631-640, May 1997

[back] 7. Dr. Ross Adey (Veterans Administration Hospital at Loma Linda University in 1996) found what appeared to be a protective effect in rats exposed to the type of radiation used in digital cellular phones. The rats were exposed to an SAR of 0.58-0.75 W/Kg 836 MHz pulsed radiation of the TDMA type two hours a day, four days a week for 23 months, with the signals turned on and off every 7.5 minutes, so total exposure was 4 hours a week. Interestingly this effect was not present when a non-digital, analog signal was used. Rats exposed developed cancer less often. This study shows that low power fields of the digital cellular frequency can influence cancer development. Whether they would protect or promote in our children is a question for further study.

Ross Adey of the Veterans Administration Hospital at Loma Linda University, CA presented the results of pulsed (digital cellular) radiation on June 13, 1996 at the 18th Annual Meeting of the Bioelectromagnetics Society in Victoria, Canada. He presented the findings of the analog cellular phone radiation effect at the June 1997 2nd World Congress for Electricity and Magnetism in Biology and Medicine in Bologna, Italy. Reviews can be found in Microwave News issues July/August, 1996 and March/April 1997.

In recognition of his more than three decades of "fundamental contributions to the emerging science of the biological effects of electromagnetic fields," the authors of the November 2004 Report of the European Union's REFLEX Project (*Risk Evaluation of Potential Environmental Hazards From Low Frequency Electromagnetic Field Exposure Using Sensitive in vitro Methods*) chose to include Dr. Adey's personal views on Electromagnetic Field Exposure research as the Foreword to that report. To view the entire report, see: http://www.itis.ethz.ch/downloads/REFLEX_Final%20Report_171104.pdf (http://www.itis.ethz.ch/downloads/REFLEX_Final%20Report_171104.pdf)

The following is taken from Dr. Adey's Foreword found on pages 1-3 of the REFLEX Report:

The Future of Fundamental Research in a Society Seeking Categorical Answers to Health Risks of New Technologies

In summary, we have become superstitious users of an ever-growing range of technologies, but we are now unable to escape the web that they have woven around us.

Media reporters in general are no better informed. Lacking either responsibility or accountability, they have created feeding frenzies from the tiniest snippets of information gleaned from scientific meetings or from their own inaccurate interpretation of published research. In consequence, the public has turned with pleading voices to government legislatures and bureaucracies for guidance . . .

We face the problem brought on by the blind leading the blind. Because of public pressure for rapid answers to very complex biological and physical issues, short-term research programs have been funded to answer specific questions about certain health risks.

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In many countries, and particularly in the USA, the effects of such harassing and troublesome tactics or independent, careful fundamental research have been near tragic. Beguiled by health hazard research as the only source of funding, accomplished basic scientists have diverted from a completely new frontier in physical regulation of biological mechanisms at the atomic level. Not only have governments permitted corporate interests in the communications industry to fund this research, they have even permitted them to determine the research questions to be addressed and to select the institutions performing the research.

[back] 8. Dr. A. W. Guy reported an extensive investigation on rats chronically exposed from 2 up to 27 months of age to low-level pulsed microwaves at SARs up to 0.4 W/Kg. The exposed group was found to have a significantly higher incidence of primary cancers.

A. W. Guy, C. K. Chou, L. Kunz, L. Crowley, and J. Krupp, "Effects of Long-Term Low-Level Radiofrequency Radiation Exposure on Rats." Volume 9. Summary. Brooks Air Force Base, Texas, USAF School of Aerospace Medicine, USF-SAM-TR-85-11; 1985

[back] 9. Drs. Henry Lai and N. P. Singh of the University of Washington in Seattle have reported both single- and double-strand DNA breaks in the brains of rats exposed to radiofrequency electromagnetic radiation at an SAR of 1.2 W/Kg. DNA is the carrier of the genetic information in all living cells. Cumulated DNA strand breaks in brain cells can lead to cancer or neurodegenerative diseases.

H. Lai and N. P. Singh, "Single- and Double-Strand DNA Breaks in Rat Brain Cells After Acute Exposure to Radiofrequency Electromagnetic Radiation," International Journal of Radiation Biology, Vol 69, No. 4, 513-521, 1996

[back] 10. Dr. Stanislaw Szmigielski has studied many thousands of Polish soldiers. He has found that those exposed to radiofrequency and microwave radiation in the workplace had more than double the cancer rate of the unexposed servicemen analyzing data from 1971-1985. He has presented further data suggesting a dose-response relationship with soldiers exposed to 100-200 W/cm² suffering 1.69 times as many cancers as the unexposed, and those exposed to 600-1000 W/cm² suffering 4.63 times as many cancers. The level considered safe for the public according to FCC regulations is 1000 W/cm². Occupational exposure up to 5000 W/cm² is allowed.

S. Szmigielski, "Cancer Morbidity in Subjects Occupationally Exposed to High Frequency (Radiofrequency and Microwave) Electromagnetic Radiation," The Science of the Total Environment 180:9-17, 1996

[back] 11. Dr. Bruce Hocking found an association between increased childhood leukemia incidence and mortality in the proximity of television towers. The power density ranged from 0.2-8.0 W/cm² nearer and 0.02 W/cm² farther from the towers.

B. Hocking, I. R. Gordon, H. L. Grain, and G. E. Hatfield, "Cancer Incidence and Mortality and Proximity to TV Towers," Medical Journal of Australia 165: 601-605; 1996

[back] 12. Drs. Mann and Röschke investigated the influence of pulsed high-frequency RF/MW radiation of digital mobile radio telephones on sleep in healthy humans. They found a hypnotic effect with shortening of sleep onset latency and a REM (Rapid Eye Movement) suppressive effect with reduction of duration and percentage of REM sleep. "REM sleep plays a special physiological role for information processing in the brain, especially concerning consolidation of new experiences. Thus the effects observed possibly could be associated with alterations of memory and learning functions."

K. Mann and J. Röschke, "Effects of Pulsed High-Frequency Electromagnetic Fields on Human Sleep," Neuropsychobiology 33:41-47, 1996

[back] 13. Dr. Allen Frey has been researching RF/MW radiation for over 3 decades. Here is the abstract on a paper concerning headaches and cellular phone radiation. "There have been numerous recent reports of headaches occurring in association with the use of hand-held cellular telephones. Are these reported headaches real? Are they due to emissions from telephones? There is reason to believe that the answer is "yes" to both questions. There are several lines of evidence to support this conclusion. First, headaches as a consequence of exposure to low intensity microwaves were reported in the literature 30 years ago. These were observed during the course of microwave hearing research before there were cellular telephones. Second, the blood-brain barrier appears to be involved in headaches, and low intensity microwave energy exposure affects the barrier. Third, the

dopamine-opiate systems of the brain appear to be involved in headaches, and low intensity electromagnetic energy exposure affects those systems. In all three lines of research, the microwave energy used was approximately the same--in frequencies, modulations, and incident energies--as those emitted by present day cellular telephones, Could the current reports of headaches be the canary in the coal mine, warning of biologically significant effects?"

A. H. Frey, "Headaches from Cellular Telephones: Are they Real and What Are the Implications?" Environmental Health Perspectives Volume 106, Number 3, pp.101-103, March 1998

[back] 14. Henry Lai's review of the literature concerning neurological effects of RF/MW radiation: Existing data indicate that RF/MW radiation of relatively low intensity can affect the nervous system. Changes in blood-brain barrier, morphology, electrophysiology, neurotransmitter functions, cellular metabolism, and calcium efflux, and genetic effects have been reported in the brain of animals after exposure to RF. These changes can lead to functional changes in the nervous system. Behavioral changes in animals after exposure to RR have been reported.

Even a temporary change in neural functions after RF/MW radiation exposure could lead to adverse consequences. For example, a transient loss of memory function or concentration could result in an accident when a person is driving. Loss of short term working memory has indeed been observed in rats after acute exposure to RF/MW radiation.

Research has also shown that the effects of RF/MW radiation on the nervous system can cumulate with repeated exposure. The important question is, after repeated exposure, will the nervous system adapt to the perturbation and when will homeostasis break down? Related to this is that various lines of evidence suggest that responses of the central nervous system to RF/MW radiation could be a stress response. Stress effects are well known to cumulate over time and involve first adaptation and then an eventual break down of homeostatic processes.

H. Lai, "Neurological Effects of Radiofrequency Electromagnetic Radiation Relating to Wireless Communication Technology," Paper presentation at the IBC-UK Conference: "Mobile Phones-Is There a Health Risk?" September 16-17, 1997, Brussels, Belgium

[back] 15. Blood-Brain-Barrier: The blood-brain-barrier (BBB) is primarily a continuous layer of cells lining the blood vessels of the brain. It is critical for regulation of the brain's activity. Lai notes that "Even though most studies indicate that changes in the BBB occurs only after exposure to RF/MW radiation of high intensities with significant increase in tissue temperature, several studies have reported increases in permeability after exposure to RF/MW radiation of relatively low intensities...Pulsed RF seems to be more potent than continuous wave RF." Pulsed RF/MW is the type used in digital cellular systems. Effects on the BBB were noted at the 0.2 W/cm² level, and even at SAR of 0.016-5 W/kg. These effects could lead to local changes in brain function.

H. Lai, Ibid

[back] 16. Cellular Morphology: RF/MW radiation induced morphological changes of the central nervous system cells and tissues have been shown to occur under relatively high intensity or prolonged exposure to the RF/MW radiation. However, there are several studies which show that repeated exposure at relatively low power intensities caused morphological changes in the central nervous system. Again here pulsed (as in digital phone use) RF/MW radiation produced more pronounced effects. Certain drugs given to nonhuman primates sensitized them, for instance allowing eye damage to occur at very low power intensities. Dr Lai notes "Changes in morphology especially cell death, could have an important implication on health. Injury-induced cell proliferation has been hypothesized as a cause of cancer." Some of these experiments were in the range of SAR 0.53 W/kg or even 0.26 W/kg.

H. Lai, Ibid

[back] 17. Neural Electrophysiology: Changes in neuronal electrophysiology, evoked potentials, and EEG have been reported. Some effects were observed at low intensities and after repeated exposure, suggesting cumulative effect. Energy density levels were as low as 50 W/cm².

H. Lai, Ibid

[back] 18. Neurotransmitters: Neurotransmitters are molecules which transmit information from one nerve cell to

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another. Early studies have reported changes in various neurotransmitters (catecholamines, serotonin, and acetylcholine) in the brain of animals only after exposure to high intensities of RF/MW radiation. However, there are more recent studies that show changes in neurotransmitter functions after exposure to low intensities of RF radiation. For example, effects were seen at $50 \mu\text{W}/\text{cm}^2$ in one experiment. U.S. and Canadian RF/MW radiation safety policies allow exposures of $1000 \mu\text{W}/\text{cm}^2$ at that frequency.

RF/MW radiation activates endogenous opioids in the brain. Endogenous opioids are neurotransmitters with morphine-like properties and are involved in many important physiological and behavioral functions, such as pain perception and motivation.

The response to RF/MW radiation depends on the area of the brain studied and on the duration of exposure. Exposure to RF/MW radiation has been shown to affect the behavioral actions of benzodiazepines (these are drugs such as Valium).

H. Lai, Ibid

[back] 19. Metabolic Changes in Neural Tissue: Several studies investigated the effects of RF/MW radiation exposure on energy metabolism in the rat brain. Surprisingly, changes were reported after exposure to relatively low intensity RF/MW radiation for a short duration of time (minutes). The effects depended on the frequency and modulation characteristics of the RF/MW radiation and did not seem to be related to temperature changes in the tissue.

Calcium ions play important roles in the functions of the nervous system, such as the release of neurotransmitters and the actions of some neurotransmitter receptors. Thus changes in calcium ion concentration could lead to alterations in neural functions. This is an area of considerable controversy because some researchers have also reported no significant effects of RF/MW radiation exposure on calcium efflux. However, when positive effects were observed, they occurred after exposure to RF/MW radiation of relatively low intensities and were dependent on the modulation and intensity of the RF/MW radiation studied (window effects). Some studies had SARs as low as 0.05-0.005 W/Kg.

H. Lai, Ibid

[back] 20. Cytogenetic effects have been reported in various types of cells after exposure to RF/MW radiation. Recently, several studies have reported cytogenetic changes in brain cells by RF/MW radiation, and these results could have important implications for the health effects of RF/MW radiation. Genetic damage to glial cells can result in carcinogenesis. However, since neurons do not undergo mitosis, a more likely consequence of neuronal genetic damage is changes in functions and cell death, which could either lead to or accelerate the development of neurodegenerative diseases. Power densities of $1 \text{ mW}/\text{cm}^2$ were employed, a level considered safe for the public by the FCC.

RF/MW radiation-induced increases in single and double strand DNA breaks in rats can be blocked by treating the rats with melatonin or the spin-trap compound N-t-butyl-phenylnitron. Since both compounds are potent free radical scavengers, these data suggest that free radicals may play a role in the genetic effect of RF. If free radicals are involved in the RF-induced DNA strand breaks in brain cells, results from this study could have an important implication on the health effects of RF exposure. Involvement of free radicals in human diseases, such as cancer and atherosclerosis, has been suggested. Free radicals also play an important role in the aging process, which has been ascribed to be a consequence of accumulated oxidative damage to body tissues, and involvement of free radicals in neurodegenerative diseases, such as Alzheimer's, Huntington, and Parkinson, has also been suggested. One can also speculate that some individuals may be more susceptible to the effects of RF/MW radiation exposure.

H. Lai, Ibid

[back] 21. Dr. A. A. Kolodynski and V. V. Kolodynska of the Institute of Biology, Latvian Academy of Sciences presented the results of experiments on school children living in the area of the Skrunda Radio Location Station in Latvia. Motor function, memory, and attention significantly differed between the exposed and control groups. The children living in front of the station had less developed memory and attention and their reaction time was slower.

A. A. Kolodynski, V. V. Kolodynska, "Motor and Psychological Functions of School Children Living in the Area of the Skrunda Radio Location Station in Latvia," *The Science of the Total Environment* 180:87-93, 1996.

[back] 22. Dr. H. Lai and colleagues in 1993 exposed rats to 45 minutes of pulsed high frequency RF/MW radiation at low intensity and found that the rats showed retarded learning, indicating a deficit in spatial "working memory" function.

H. Lai, A. Horita, and A. W. Guy, "Microwave Irradiation Affects Radial-Arm Maze Performance in the Rat," Bioelectromagnetics 15:95-104, 1994

NOTE: Dr. Lai's January 2005 compilation of published RF/MW radiation studies demonstrating biological effects of exposure to low-intensity RF/MW radiation is included as a Reference section at the end of this report.

[back] 23. Dr. Stefan Braune reported a 5-10 mm Hg resting blood pressure rise during exposure to RF/MW radiation of the sort used by cellular phones in Europe. The Lancet, the British medical journal where the report appeared, stated that "Such an increase could have adverse effects on people with high blood pressure."

S. Braune, "Resting Blood Pressure Increase During Exposure to a Radio-Frequency Electromagnetic Field," The Lancet 351, pp. 1,857-1,858, 1998

[back] 24. Dr. Kues and colleagues (of Johns Hopkins University and the Food and Drug Administration) found that placing timolol and pilocarpine into the eyes of monkeys and then exposing them to low power density pulsed RF/MW radiation caused a significant reduction in the power-density threshold for causing damage to the cells covering the eye and the iris. In fact the power was reduced by a factor of 10, so that it entered the "acceptable safe" level of the FCC, 1 mW/cm²! Timolol and pilocarpine are commonly used by people suffering from glaucoma. This is a very important study, as it points to the fact that laboratory experiments under "ideal" conditions are rarely what one finds in real life. The "safe" level of RF/MW radiation exposure for healthy people is likely to be very different than for those of us who suffer from illness, take medications, or are perhaps simply younger or older than those in the experiments.

H. A. Kues, J. C. Monahan, S. A. D'Anna, D. S. McLeod, G. A. Luty, and S. Koslov, "Increased Sensitivity of the Non-Human Primate Eye to Microwave Radiation Following Ophthalmic Drug Pretreatment," Bioelectromagnetics 13:379-393, 1992

[back] 25. The World Health Organization states that "concerns have been raised about the safety of cellular mobile telephones, electric power lines and police speed-control 'radar guns.' Scientific reports have suggested that exposure to electromagnetic fields emitted from these devices could have adverse health effects, such as cancer, reduced fertility, memory loss, and adverse changes in the behaviour and development of children.' Therefore, "In May 1996, in response to growing public health concerns in many Member States over possible health effects from exposure to an ever-increasing number and diversity of EMF sources, the World Health Organization launched an international project to assess health and environmental effects of exposure to electric and magnetic fields, which became known as the International EMF Project. The International EMF Project will last for five years." "A number of studies at [frequencies above about 1 MHz] suggest that exposure to RF fields too weak to cause heating may have adverse health consequences, including cancer and memory loss. Identifying and encouraging coordinated research into these open questions is one of the major objectives of the International EMF Project."

World Health Organization Fact Sheet N181, "Electromagnetic Fields and Public Health, The International EMF Project," reviewed May 1998 and World Health Organization Fact Sheet N182, "Electromagnetic Fields and Public Health, Physical Properties and Effects on Biological Systems," reviewed May 1998,

[back] 26. The U. S. Food and Drug Administration in a January 14, 1998 letter to the House Telecommunications Subcommittee stated it "believes additional research in the area of RF is needed." In 1997 the FDA established the following priorities:

- Chronic (lifetime) animal exposures should be given the highest priority.
- Chronic animal exposures should be performed both with and without the application of chemical initiating agents to investigate tumor promotion in addition to tumorigenesis.
- Identification of potential risks should include end points other than brain cancer (e.g. ocular effects of RF radiation exposure).
- Replication of prior studies demonstrating positive biological effects work is needed. A careful replication of the Chou and Guy study (*Bioelectromagnetics*, 13, pp.469-496, 1992) which suggests that chronic exposure of rats to microwaves is associated with an increase in tumors, would contribute a great deal to the risk identification process for wireless communication products.

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- Genetic toxicology studies should focus on single cell gel studies of DNA strand breakage and on induction of micronuclei.
- Epidemiology studies focused on approaches optimized for hazard identification are warranted.

Food and Drug Administration Recommendations quoted in Microwave News, March/April, 1997

[back] 27. The International Agency for Research on Cancer (IARC) is planning a multi-country, multi-million dollar study of cancer among users of wireless phones, beginning 1998. *Microwave News, January/February, 1998*

[back] 28. The Swedish Work Environmental Fund initiated a new epidemiological study on cellular phone radiation and brain tumors in 1997. *Microwave News, November/December, 1997*

[back] 29. The National Cancer Institute announced plans for a 5 year study of brain tumors and RF/MW radiation in 1993. *Microwave News, January/February, 1993*

[back] 30. The European Commission (EC) Expert Group on health effects of wireless phones called for a 5 year research program with a \$20 million budget, reported 1997. *Microwave News, January/February, 1997*

[back] 31. A report commissioned by New Zealand's Ministry of Health stated that "It is imperative that the scientific issues be clarified as soon as possible, as there is much at stake." It called for more research to examine the potential health effects of RF radiation. *Microwave News, November/December, 1996*

[back] 32. The National Health and Medical Research Council of Australia announced its sponsorship of a 5 year \$3.5 million project on potential health effects of mobile phone technology in 1996. *Microwave News, November/December, 1996*

[back] 33. The Commonwealth Scientific Industrial Research Organization (CSIRO) of Australia concluded in 1995 that the safety of cellular telephones cannot be resolved "in the near future." Dr. Stan Barnett, a principal researcher of CSIRO, states that "My goal is to establish a national committee to approach this problem by coordinating relevant and focused research." He estimated a budget of \$3 million over a 3 year period would be necessary.

Commonwealth Scientific Industrial Research Organization, "Status of Research on Biological Effects and Safety of Electromagnetic Radiation: Telecommunications Frequencies," a report prepared by Dr. Stan Barnett, as cited in Microwave News, September/October, 1995

[back] 34. In Canada, Expert Panels are formed in response to requests from governments and other organizations for guidance on public policy issues where specialized knowledge is required. The Royal Society of Canada (RSC) is the only national academic organization, encompassing all fields of study in the sciences, arts and humanities that provides, through its Committee on Expert Panels, a service to Canadians by convening Expert Panels that produce publicly disseminated, arms-length, third party reviews. The most recent Expert Panel report addressing RF/MW radiation examines new data on dosimetry and exposure assessment, thermoregulation biological effects such as enzyme induction, and toxicological effects, including genotoxicity, carcinogenicity, and testicular and reproductive outcomes. Epidemiological studies of mobile phone users and occupationally exposed populations are examined, along with human and animal studies of neurological and behavioural effects. All of the authoritative reviews completed within the last two years have supported the need for further research to clarify the possible associations between RF fields and adverse health outcomes that have appeared in some reports. See: http://www.rsc.ca//index.php?lang_id=1&page_id=120 (http://www.rsc.ca/index.php?lang_id=18&page_id=120).

Recent Advances in Research on Radiofrequency Fields and Health: 2001-2003; A Follow-up to The Royal Society of Canada, Report on the Potential Health Risks of Radiofrequency Fields from Wireless Telecommunication Devices, 1999

[back] 35. The European Union effort to address this issue is in the study *Risk Evaluation of Potential Environmental Hazards from Low Energy Electromagnetic Field Exposure Using Sensitive in vitro Methods (REFLEX)*. Exposure to electromagnetic fields (EMF) in relation to health is a controversial topic throughout the industrial world. So far epidemiological and animal studies have generated conflicting data and thus uncertainty regarding possible adverse health effects. This situation has triggered controversies in communities especially in Europe with its high density of population and industry and the omnipresence of EMF in infrastructures and consumer products. These controversies are affecting the siting of facilities, leading people to relocate, schools to

close or power lines to be re-sited, all at great expense. The European Union believes that causality between EMF exposure and disease can never be regarded as proven without knowledge and understanding of the basic mechanisms possibly triggered by EMF. To search for those basic mechanisms powerful technologies developed in toxicology and molecular biology were to be employed in the REFLEX project to investigate cellular and sub-cellular responses of living cells exposed to EMF *in vitro*.

The REFLEX data have made a substantial addition to the data base relating to genotoxic and phenotypic effects of both ELF-EMF and RF-EMF on *in vitro* cellular systems. While the data neither precludes nor confirms a health risk due to EMF exposure nor was the project designed for this purpose, the value lies in providing new data that will enable mechanisms of EMF effects to be studied more effectively than in the past. Furthermore, the REFLEX data provide new information that will be used for risk evaluation by WHO, IARC and ICNIRP. For further information on REFLEX see: http://europa.eu.int/comm/research/quality-of-life/ka4/ka4_electromagnetic_en.html (http://europa.eu.int/comm/research/quality-of-life/ka4/ka4_electromagnetic_en.html)

[back] 36. The Swedish Radiation Protections Institute (SSI) endeavors to ensure that human beings and the environment are protected from the harmful effects of radiation, both in the present and in the future. SSI has focused on epidemiological research on cancer and exposure from mobile phones and transmitters as well as experimental cancer research. In addition three selected topics were also discussed, namely blood-brain barrier heat shock proteins, and precautionary framework. For further information on SSI see: http://www.ssi.se/forfattning/eng_forfattlista.html (http://www.ssi.se/forfattning/eng_forfattlista.html)

[back] 37. In the United Kingdom, the National Radiological Protection Board (NRPB) was created by the Radiological Protection Act 1970. The statutory functions of NRPB are to advance the acquisition of knowledge about the protection of mankind from radiation hazards through research and to provide information and advice to persons (including Government Departments) with responsibilities in the United Kingdom in relation to the protection from radiation hazards either of the community as a whole or of particular sections of the community. The NRPB believes that there is a need for better occupational studies rather than simply for more. In particular, the studies need to be of occupational groups for whom measurements show that there is genuinely a substantially raised exposure to RF fields. If the studies are to be more informative than those so far, a key requirement will be for improved exposure measurement (or improved estimation of exposure) for individuals, or at least for occupational groups. It would be desirable, as far as practical, that the studies should measure the intensity and timing of RF field exposures, and also that they should include some assessment of major RF field exposures from sources other than the current occupation. Ideally, exposure assessment needs to be anatomical site (organ)-specific, because some sources result in greatly differing doses to different parts of the body. It is a difficulty in these prescriptions, of course, that the appropriate exposure metric is unknown. For further information on NRPE see: <http://www.nrp.org/index.htm> (<http://www.nrp.org/index.htm>)

[back] 38. On January 5, 2005, the EMF-Team Finland issued the Helsinki Appeal 2005 to members of the European Parliament. In it physicians and researchers call on the European Parliament to apply the Precautionary Principle to electromagnetic fields, especially in the radio- and microwave- frequency bands. They criticize the present RF/MW radiation safety standards that do not recognize the biological effects caused by non-thermal exposures to non-ionizing radiation [i.e., RF/MW radiation.] They also call for continued refunding of the REFLEX EMF research program. The text of the Helsinki Appeal 2005 is found at: <http://www.emrpolicy.org/news/headlines/index.htm> (<http://www.emrpolicy.org/news/headlines/index.htm>)

[back] 39. On July 19, 1993 Dr. Elizabeth Jacobson, Deputy Director for Science, Center for Devices and Radiological Health, Food and Drug Administration criticized Thomas Wheeler, President of the Cellular Telecommunications Industry Association:

"I am writing to let you know that we were concerned about two important aspects of your press conference of July 16 concerning the safety of cellular phones, and to ask that you carefully consider the following comments when you make future statements to the press. First, both the written press statements and your verbal comments during the conference seemed to display an unwarranted confidence that these products will be found absolutely safe. In fact, the unremittingly upbeat tone of the press packet strongly implies that there can be no hazard, leading the reader to wonder why any further research would be needed at all....More specifically, your press packet selectively quotes from our Talk Paper of February 4 in order to imply that FDA believes cellular phones are

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"safe." ("There is no proof at this point that cellular phones are harmful.") In fact, the same Talk Paper also states "There is not enough evidence to know for sure, either way." Our position, as we have stated it before, is this. Although there is no direct evidence linking cellular phones with harmful effects in humans, a few animal studies suggest that such effects could exist. It is simply too soon to assume that cellular phones are perfectly safe, or that they are hazardous--either assumption would be premature. This is precisely why more research is needed."

Full text of letter can be found in Microwave News, July/August, 1993

[back] 40. In 1993 the Director of the Office of Radiation and Indoor Air of the Environmental Protection Agency suggested that the FCC not adopt the 1992 ANSI/IEEE standard "due to serious flaws," among them (1) "the ANSI/IEEE conclusion that there is no scientific data indicating that certain subgroups of the population are more at risk than others is not supported by NCRP and EPA reports" and (2) "the thesis that ANSI/IEEE recommendations are protective of all mechanisms of interaction is unwarranted because the adverse effects level in the 1992 ANSI/IEEE standard are based on a thermal effect."

Letter from Margo T. Oge, Director, Office of Radiation and Indoor Air to Thomas Stanley, Chief Engineer, Office of engineering and Technology, FCC, dated Nov 9, 1993

[back] 41. A brief sampling of the CSIRO report:

Problems in studies of human populations published to date include imprecise estimates of exposure. As a result such epidemiological studies may underestimate any real risk. The likelihood of epidemiological studies providing useful information is questionable, particularly if the biological end point cannot be predicted. Its value in the short term (less than 10 years) must be negligible unless there was an enormous increase in the rate of cancer growth. Interestingly, the incidence of brain tumors in the EC countries has increased substantially in recent years.

RF safety cannot be assessed in the absence of reported serious effects when so little research has been aimed at the problem. It is somewhat surprising, and rather disappointing, to find that although the literature contains many hundreds of publications, there are very few areas of consensus....At low levels the absence of clear thresholds and [the] presence of intensity and frequency windows have created questions rather than provided answers.

There is no doubt that the interpretation of bioeffects data has been clouded by a preoccupation with thermally mediated processes. In fact, development of the ANSI/IEEE standard is based only on well-established thermal effects, and ignores the more subtle non-thermal processes that are more difficult to interpret and apply to human health.

Commonwealth Scientific Industrial Research Organization, "Status of Research on Biological Effects and Safety of Electromagnetic Radiation: Telecommunications Frequencies," a report prepared by Dr. Stan Barnett, as cited in Microwave News, September/October, 1995

[back] 42. Statement from the October 25-28, 1998 "Symposium of Mobile Phones and Health - Workshop on Possible Biological and Health Effects of RF Electromagnetic Fields" held at the University of Vienna, Austria.

The preferred terminology to be used in public communication: Instead of using the terms "athermal", "non-thermal" or "microthermal" effects, the term "low intensity biological effects" is more appropriate.

Preamble: The participants agreed that biological effects from low-intensity exposures are scientifically established. However, the current state of scientific consensus is inadequate to derive reliable exposure standards. The existing evidence demands an increase in the research efforts on the possible health impact and on an adequate exposure and dose assessment.

Base stations: How could satisfactory Public Participation be ensured: The public should be given timely participation in the process. This should include information on technical and exposure data as well as information on the status of the health debate. Public participation in the decision (limits, siting, etc.) should be enabled.

Cellular phones: How could the situation of the users be improved: Technical data should be made available to the users to allow comparison with respect to EMF-exposure. In order to promote prudent usage, sufficient information on the health debate should be provided. This procedure should offer opportunities for the users to manage reduction in EMF-exposure. In addition, this process could stimulate further developments of low-intensity emission devices.

[back] 43. Statement from the June 7-8, 2000 International Conference on Cell Tower Siting Linking Science and Public Health, Salzburg, Austria. The full report can be found at: www.land-sbg.gv.at/celltower (<http://www.land-sbg.gv.at/celltower>)

- It is recommended that development rights for the erection and for operation of a base station should be subject to a permission procedure. The protocol should include the following aspects:
 - Information ahead and active involvement of the local public
 - Inspection of alternative locations for the siting
 - Protection of health and wellbeing
 - Considerations on conservation of land- and townscape
 - Computation and measurement of exposure
 - Considerations on existing sources of HF-EMF exposure
 - Inspection and monitoring after installation

- It is recommended that a national database be set up on a governmental level giving details of all base stations and their emissions.

- It is recommended for existing and new base stations to exploit all technical possibilities to ensure exposure is as low as achievable (ALATA-principle) and that new base stations are planned to guarantee that the exposure at places where people spend longer periods of time is as low as possible, but within the strict public health guidelines.

- Presently the assessment of biological effects of exposures from base stations in the low-dose range is difficult but indispensable for protection of public health. There is at present evidence of no threshold for adverse health effects.
 - Recommendations of specific exposure limits are prone to considerable uncertainties and should be considered preliminary. For the total of all high frequency irradiation a limit value of 100 mW/m² (10 μW/cm²) is recommended.
 - For preventive public health protection a preliminary guideline level for the sum total of exposures from all ELF pulse modulated high-frequency facilities such as GSM base stations of 1 mW/m² (0.1 μW/cm²), is recommended.

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[back] 44. Scientists attending the September 13-14, 2002 International Conference "State of the Research on Electromagnetic Fields – Scientific and Legal Issues," organized by ISPESL (National Institute for Prevention and Work Safety, Italy), the University of Vienna, and the City of Catania, held in Catania, Italy, agreed to the following:

- Epidemiological and *in vivo* and *in vitro* experimental evidence demonstrates the existence of electromagnetic field (EMF) induced effects, some of which can be adverse to health.
- We take exception to arguments suggesting that weak (low intensity) EMF cannot interact with tissue.
- There are plausible mechanistic explanations for EMF-induced effects which occur below present ICNIR and IEEE guidelines and exposure recommendations by the EU.
- The weight of evidence calls for preventive strategies based on the precautionary principle. At times the precautionary principle may involve prudent avoidance and prudent use.
- We are aware that there are gaps in knowledge on biological and physical effects, and health risks related to EMF, which require additional independent research.

[back] 45. The Freiburger Appeal is a German based appeal by mainly medical practitioners who are concerned about the effects, they believe, from mobile phone technology including masts that are appearing in their patients. It started in Oct 2002 and with very little international publicity has got 50,000 signatories with at least 2000 medical signatures from across the world. Mast These physicians and scientists agreed to establish an international scientific commission to promote research for the protection of public health from EMF and to develop the scientific basis and strategies for assessment, prevention, management and communication of risk based on the precautionary principle.

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Excerpt:

On the basis of our daily experiences, we hold the current mobile communications technology (introduced in 1992 and since then globally extensive) and cordless digital telephones (DECT standard) to be among the fundamental triggers for this fatal development. One can no longer evade these pulsed microwaves. They heighten the risk of already-present chemical/physical influences, stress the body-immune system, and can bring the body-still-functioning regulatory mechanisms to a halt. Pregnant women, children, adolescents, elderly and sick people are especially at risk.

Statement of the physicians and researchers of Interdisziplinäre Gesellschaft für Umweltmedizin e. V. (Interdisciplinary Association for Environmental Medicine) IGUMED, Sackingen, Germany, September 19, 2002. The Freiburger Appeal can be found at: <http://www.mastsanity.org/doctors-appeals.html> (<http://www.mastsanity.org/doctors-appeals.html>).

[back] 46. Report of the European Union's REFLEX Project (Risk Evaluation of Potential Environmental Hazards from Low Frequency Electromagnetic Field Exposure Using Sensitive *in vitro* Methods), November 2004. The Project studied ELF and RF exposures to various animal cell types. The report is found at: http://www.itis.ethz.ch/downloads/REFLEX_Final%20Report_171104.pdf (http://www.itis.ethz.ch/downloads/REFLEX_Final%20Report_171104.pdf)

From the Summary: [t]he omnipresence of EMF's in infrastructures and consumer products have become a topic of public concern. This is due to the fear of people that based on the many conflicting research data a risk to their health cannot be excluded with some certainty. Therefore, the overall objective of REFLEX was to find out whether or not the fundamental biological processes at the cellular and molecular level support such an assumption. For this purpose, possible effects of EMF's on cellular events controlling key functions, including those involved in carcinogenesis and in the pathogenesis of neurodegenerative disorders, were studied through focused research. Failure to observe the occurrence of such key critical events in living cells after EMF exposure would have suggested that further research efforts in this field could be suspended and financial resources be reallocated to the investigation of more important issues. But as clearly demonstrated, the results of the REFLEX project show the way into the opposite direction.

[back] 47. From the Discussion section of the December 20, 2004 Second Annual Report of Sweden's Radiation Protection Board (SSI) entitled: *Recent Research on Mobile Telephony and Health Risks: Second Annual Report from SSI's Independent Expert Group on Electromagnetic Fields*. The complete report is available at: http://www.ssi.se/english/EMF_exp_Eng_2004.pdf (http://www.ssi.se/english/EMF_exp_Eng_2004.pdf)

To date, little is known about the levels of radiofrequency radiation exposure in the general population from sources such as mobile phones being used by oneself or other people, mobile phone base stations, and radio and television transmitters. Measurements that have been performed have usually been made as a result of public concern about base station exposures or other specific sources, and have therefore been made at locations that could be assumed to have higher fields than would be the case if measurement locations were selected randomly. Furthermore, all measurements have been stationary, and there is today no knowledge about the level of exposure that an individual will have throughout the day.

There is need for information about the personal exposure to RF fields in the general population, to enhance the understanding of the relative importance of exposure from base stations close to the home, from radio and television transmitters, and from the use of mobile phones . . . Studies with personal RF exposure measurements of randomly selected samples of the general population are strongly encouraged.

[back] 48. Released January 11, 2005, Mobile Phones and Health 2004: Report by the Board of NRPB Documents of the NRPB: Volume 15, No. 5. See: http://www.nrpb.org/publications/documents_of_nrpb/abstracts/absd15-5.htm (http://www.nrpb.org/publications/documents_of_nrpb/abstracts/absd15-5.htm)

From the Executive Summary:

The Board notes that a central recommendation in the Stewart Report was that a precautionary approach to the use of mobile phone technologies be adopted until much more detailed and scientifically robust information on any health effects becomes available.

The Board considers that it is important to understand the signal characteristics and field strengths arising from new telecommunications systems and related technologies, to assess the RF exposure of people, and to understand the potential biological effects on the human body.

[back] 49. The ICNIRP exposure guidelines are only designed to protect against "known adverse health impacts," according to Dr. Jürgen Bernhardt, ICNIRP's chairman. Bernhardt reviewed the updated limits, which cover the spectrum from 1 Hz to 300 GHz, in a presentation at the 20th Annual Meeting of the Bioelectromagnetics Society in St. Pete Beach, FL, on June 10. The limits protect against "short-term, immediate health effects" such as nerve stimulation, contact shocks and thermal insults, according to the guidelines, which appear in the April issue of *Health Physics* (74, pp.494-522, 1998). Despite "suggestive" evidence that power frequency magnetic fields can be carcinogenic, ICNIRP has concluded that this and other non-thermal health effects have not been "established." ICNIRP has long followed this approach to standard-setting. In his talk, Bernhardt noted that the guidelines include "no consideration regarding prudent avoidance" for health effects for which evidence is less than conclusive.

Microwave News, July/August 1998

Additional References and Studies

The following references reporting biological effects of radiofrequency radiation (RFR) at low intensities through January 2005 were compiled on 12/27/04 by Henry C. Lai PhD, Research Professor of Bioengineering, University of Washington, Seattle, WA

Balode *Sci Total Environ* 180(1):81-85, 1996 - blood cells from cows from a farm close and in front of a radar installation showed significantly higher level of severe genetic damage.

Boscol et al. *Sci Total Environ* 273(1-3):1-10, 2001 - RFR from radio transmission stations (0.005 mW/cm²) affects immune system in women.

Chiang et al. *J. Bioelectricity* 8:127-131, 1989 - people who lived and worked near radio antennae and radar installations showed deficits in psychological and short-term memory tests.

de Pomerai et al. *Nature* 405:417-418, 2000. *Enzyme Microbial Tech* 30:73-79, 2002 - reported an increase in a molecular stress response in cells after exposure to a RFR at a SAR of 0.001 W/kg. This stress response is a basic biological process that is present in almost all animals - including humans.

de Pomerai et al. (*FEBS Lett* 22;543(1-3):93-97, 2003 - RFR damages proteins at 0.015-0.020 W/kg.

D'Inzeo et al. *Bioelectromagnetics* 9(4):363-372, 1988 - very low intensity RFR (0.002 – 0.004 mW/cm²) affects the operation of acetylcholine-related ion-channels in cells. These channels play important roles in physiological and behavioral functions.

Dolk et al. *Am J Epidemiol* 145(1):1-9 1997- a significant increase in adult leukemias was found in residents who lived near the Sutton Coldfield television (TV) and frequency modulation (FM) radio transmitter in England.

Dutta et al. *Bioelectromagnetics* 10(2):197-202 1989 - reported an increase in calcium efflux in cells after exposure to RFR at 0.005 W/kg. Calcium is an important component of normal cellular functions.

Fesenko et al. *Bioelectrochem Bioenerg* 49(1):29-35, 1999 - reported a change in immunological functions in mice after exposure to RFR at a power density of 0.001 mW/cm².

Hallberg O, Johansson O, (2004) concluded that continuous disturbance of cell repair mechanisms by body-resonant FM electromagnetic fields seems to amplify the carcinogenic effects resulting from cell damage caused e.g. by UV-radiation.

Hjollund et al. *Reprod Toxicol* 11(6):897, 1997 - sperm counts of Danish military personnel, who operated mobile ground-to-air missile units that use several RFR emitting radar systems (maximal mean exposure 2 mW/cm^2), were significantly lower compared to references.

Hocking et al. *Med J Aust* 165(11-12):601-605, 1996 - an association was found between increased childhood leukemia incidence and mortality and proximity to TV towers.

Ivaschuk et al. *Bioelectromagnetics* 18(3):223-229, 1999 - short-term exposure to cellular phone RFR of very low SAR (26 mW/kg) affected a gene related to cancer.

Kolodynski and Kolodynska, *Sci Total Environ* 180(1):87-93, 1996 - school children who lived in front of a radio station had less developed memory and attention, their reaction time was slower, and their neuromuscular apparatus endurance was decreased.

Kwee et al. *Electro- and Magnetobiology* 20: 141-152, 2001 - 20 minutes of cell phone RFR exposure at 0.0021 W/kg increased stress protein in human cells.

Lebedeva et al. *Crit Rev Biomed Eng* 28(1-2):323-337, 2000 - brain wave activation was observed in human subjects exposed to cellular phone RFR at 0.06 mW/cm².

Magras and Xenos *Bioelectromagnetics* 18(6):455-461, 1999 - reported a decrease in reproductive function in mice exposed to RFR at power densities of 0.000168 - 0.001053 mW/cm². Irreversible sterility was found in the fifth generation of offspring.

Mann et al. *Neuroendocrinology* 67(2):139-144, 1998 - a transient increase in blood cortisol was observed in human subjects exposed to cellular phone RFR at 0.02 mW/cm². Cortisol is a hormone involved in stress reaction.

Marinelli et al. *J Cell Physiol.* 198(2):324-332, 2004 - exposure to 900-MHz RFR at 0.0035 W/kg affected cell's self-defense responses.

Michelozzi et al. *Epidemiology* 9 (Suppl) 354p, 1998 - leukemia mortality within 3.5 km (5,863 inhabitants) near a high power radio-transmitter in a peripheral area of Rome was higher than expected.

Michelozzi et al. *Am J Epidemiol* 155(12):1096-1103, 2002 - childhood leukemia higher at a distance up to 6 km from a radio station.

Navakatikian and Tomashevskaya "Biological Effects of Electric and Magnetic Fields, Volume 1," D.O. Carpenter (ed) Academic Press, San Diego, CA, pp.333-342. 1994 - RFR at low intensities (0.01 - 0.1 mW/cm²; 0.0027-0.027 W/kg) induced behavioral and endocrine changes in rats. Decreases in blood concentrations of testosterone and insulin were reported.

Novoselova et al. *Bioelectrochem Bioenerg* 49(1):37-41, 1999 -low intensity RFR (0.001 mW/cm²) affects functions of the immune system.

Park et al. *International Archives of Occupational and Environmental Health* 77(6):387-394, 2004 - higher mortality rates for all cancers and leukemia in some age groups in the area near the AM radio broadcasting towers.

Persson et al. *Wireless Network* 3:455-461, 1997 - reported an increase in the permeability of the blood-brain barrier in mice exposed to RFR at 0.0004 - 0.008 W/kg. The blood-brain barrier envelops the brain and protects it from toxic substances.

Phillips et al. *Bioelectrochem. Bioenerg.* 45:103-110, 1998 - reported DNA damage in cells exposed to RFR at SAR of 0.0024 - 0.024 W/kg.

Polonga-Moraru et al. *Bioelectrochemistry* 56(1-2):223-225, 2002 - change in membrane of cells in the retina (eye) after exposure to RFR at 15 $\mu\text{W/cm}^2$.

Pyrpasopoulou et al. *Bioelectromagnetics* 25(3):216-227, 2004 - exposure to cell phone radiation during early gestation at SAR of 0.0005 W/kg (5 $\mu\text{W/cm}^2$) affected kidney development in rats.

Salford et al. *Environ Health Persp* Online January 29, 2003 - Nerve cell damage in mammalian brain after exposure to microwaves from GSM mobile phones signal at 0.02 W/kg.

Santini et al. *Pathol Biol* (Paris) 50(6):369-373, 2002 - increase in complaint frequencies for tiredness, headache, sleep disturbance, discomfort, irritability, depression, loss of memory, dizziness, libido decrease, in people who lived within 300 m of mobile phone base stations.

Sarimov et al. *IEEE Trans Plasma Sci* 32:1600-1608, 2004 - GSM microwaves affect human lymphocyte chromatid similar to stress response at 0.0054 W/kg.

Schwartz et al. *Bioelectromagnetics* 11(4):349-358, 1990 - calcium movement in the heart affected by RFR at SAR of 0.00015 W/kg. Calcium is important in muscle contraction. Changes in calcium can affect heart functions.

Somogyi et al. *Scanning Microsc* 5(4):1145-1155, 1991 - RFR at 0.024 W/kg caused molecular and structural changes in cells of mouse embryos.

Stagg et al. *Bioelectromagnetics* 18(3):230-236, 1997 - glioma cells exposed to cellular phone RFR at 0.0059 W/kg showed significant increases in thymidine incorporation, which may be an indication of an increase in cell division.

Stark et al. *J Pineal Res* 22(4):171-176, 1997 - a two- to seven-fold increase of salivary melatonin concentration was observed in dairy cattle exposed to RFR from a radio transmitter antenna.

Tattersall et al. *Brain Res* 904(1):43-53, 2001 - low-intensity RFR (0.0016 - 0.0044 W/kg) can modulate the function of a part of the brain called the hippocampus, in the absence of gross thermal effects. The changes in excitability may be consistent with reported behavioral effects of RFR, since the hippocampus is involved in learning and memory.

Vangelova et al. *Cent Eur J Public Health* 10(1-2):24-28, 2002 - operators of satellite station exposed to low dose (0.1127 J/kg) of RFR over a 24-hr shift showed an increased excretion of stress hormones.

Velizarov et al. *Bioelectrochem Bioenerg* 48(1):177-180, 1999 - showed a decrease in cell proliferation (division) after exposure to RFR of 0.000021 - 0.0021 W/kg.

Veyret et al. *Bioelectromagnetics* 12(1):47-56, 1991 - low intensity RFR at SAR of 0.015 W/kg affects functions of the immune system.

Wolke et al. *Bioelectromagnetics* 17(2):144-153, 1996 - RFR at 0.001W/kg affects calcium concentration in heart muscle cells of guinea pigs.

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The International Association of Fire Fighters recognizes IAFF Local 3368, Carpinteria-Summerland, California, who brought this issue to the attention of our membership through the Resolution 15, submitted through our biennial convention in August 2004. Additionally, the following local affiliates provided support for the passage of the resolution: Brookline, Massachusetts, San Diego, California, San Francisco, California and Vancouver, British Columbia. We also acknowledge the efforts of Dr. Henry C. Lai, University of Washington, Seattle, Washington; Dr. Magda Havas of Trent University, Peterborough, Ontario; Janet Newton, President of the EMR Policy Institute; and Susan Foster Ambrose for their technical support and continued passion to protect the health and safety of fire fighters and emergency medical personnel. Finally, we thank Dr. Leslie Plachta and the Safe Ossining Schools for their research efforts and their battle to stop siting cell towers on Ossining, New York schools.

RMD; 3/2005

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 (<http://client.prod.iaff.org/#menuid=27>)
 IAFF-MDA (<http://client.prod.iaff.org/#menuid=36>)
 Firefighters for Operation Warm
 (<http://www.FireFightersOW.org?tar>

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- Fire Fighter Quarterly (http://www.iaff.org/mag/)
- IAFF Dispatch (http://client.prod.iaff.org/#page=dispatch)
- IAFF 52nd Convention (http://iaffconvention2014.org/)
- IAFF Alumni (http://www.iaffalumni.org/)
- IAFF Honor Roll (http://my.iaff.org/Web/General/HonorRoll.aspx)
- IAFF Frontline Blog (http://client.prod.iaff.org/#menuid=1114)
- Frontline News Brief (http://client.prod.iaff.org/#menuid=1100)
- IAFF Motorcycle Group (http://www.iaffmg.org/?target=_blank)
- IAFF Wine Club (http://www.iaffwines.com)
- Get It Union (http://www.getitunion.com/)
- International Fire Fighters Union Alliance (http://www.iffua.org/)
- Union Sportsmen's Alliance (http://unionsportsmen.org/)
- IAFF ONLINE (http://www.iaff.org

- Pension Resources (http://client.prod.iaff.org/#page=pensionresources)
- Political Department (http://client.prod.iaff.org/#page=political)

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IAFF Foundation (http://www.iafffoundation.org/)

- Donate (https://member.iaff.org/IAFF_iMIS_Prod_Casual/iDonate/Giving/ifundContainer.aspx)
- Burn Fund (http://www.iafffoundation.org/causes/burn-fund.html)
- Disaster Relief (http://www.iafffoundation.org/causes/disaster-relief-fund.html)
- Scholarships (http://www.iaff.org/et/scholarships/)
- Fallen Fire Fighter Memorial (http://www.iafffoundation.org/causes/fallen-fire-fighter-memorial-fund.html)
- Redmond Fund (http://www.iafffoundation.org/causes/john-p-redmond-fund.html)

Social Websites

(http://client.prod.iaff.org/#menuid=4402)



(https://www.youtube.com/user/IAFFTV)

/index.asp)



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(<https://www.facebook.com/IAFFonline>)



(<https://twitter.com>

/IAFFNewsDesk)



(<https://www.pinterest.com/iaffnewsdesk/>)



(<https://www.flickr.com/photos/54031837@N07>)

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Commercial Wireless Service Facility application Epic Wireless Group, LLC / Verizon Wireless

1 message

Laura Allred <llallred2010@gmail.com>
To: planning@amadorgov.org, Chuck Beatty <cbeatty@amadorgov.org>

Tue, Jul 14, 2015 at 7:18 AM

Dear Panning Department,

Attached please find additional photos relevant to 19.48.150 (F)2, from neighboring properties. The American Flat Side Road street addresses are included in the name of the photos.

Thank you.

Elton and Laura Allred

"Let food be thy medicine and medicine be thy food" Hippocrates

On Tue, Jul 7, 2015 at 8:41 AM, Laura Allred <llallred2010@gmail.com> wrote:
Amador County Planning Department,

This email is a response to the notice and request for opposition to the permit application located at 19580 American Flat Side Road.

Should you have any questions or need clarification please contact us at 245-3401, or directly on Elton's cell number 916-764-0621.

Thank you.

Elton and Laura Allred

cc: Chuck Beatty

4 attachments



Verizon 19635.JPG
1159K



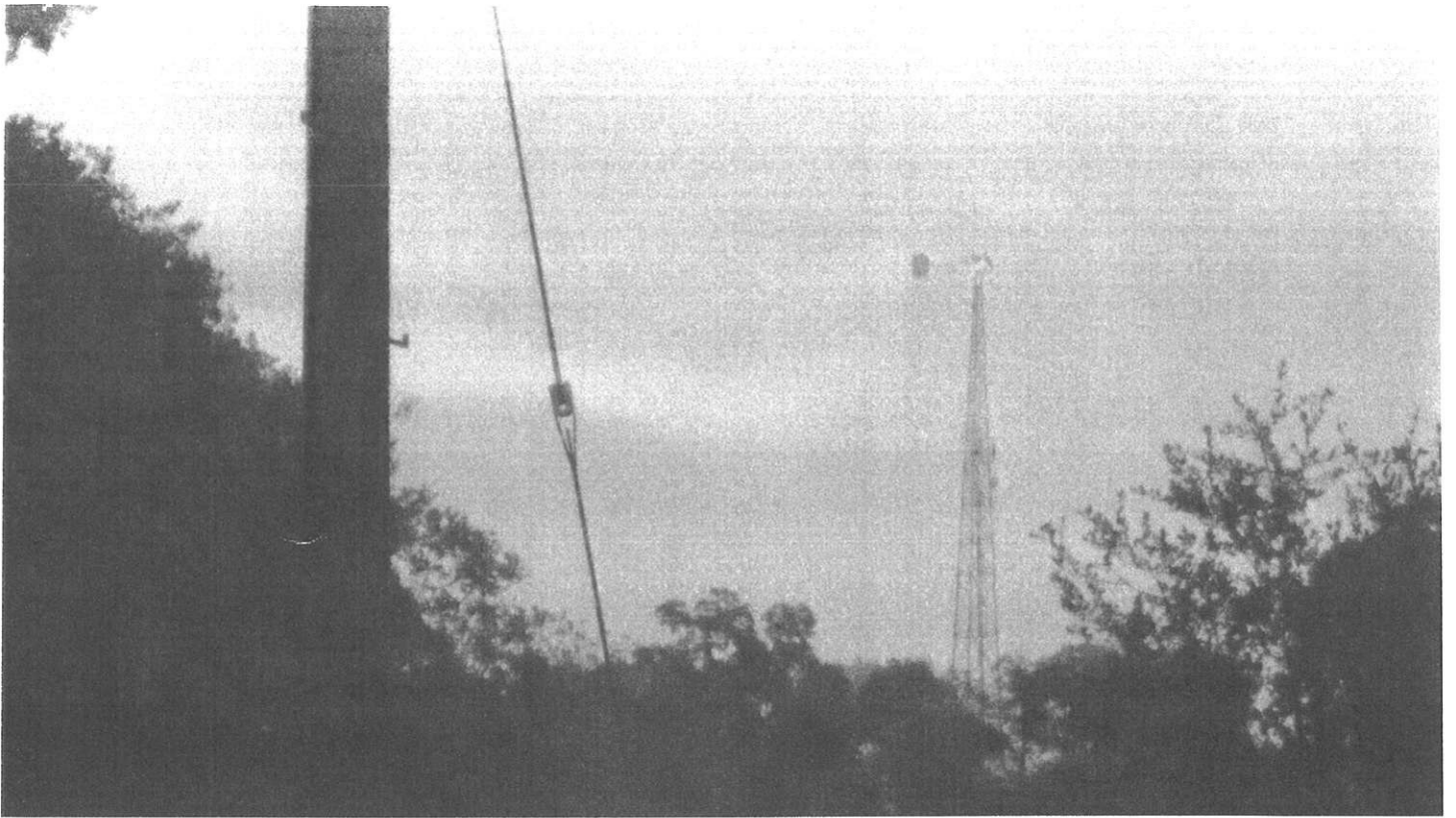
Verizon 19635-2.JPG
1069K



Verizon 19850.JPG
1146K



Verizon 19850-2.JPG
1147K



Verizon 19635

Verizon 19635-2





Verizon 19850

Verizon 19850-2





re: Commercial Wireless Service Facility application Epic Wireless Group, LLC / Verizon Wireless

1 message

Laura Allred <lallred2010@gmail.com>
To: planning@amadorgov.org, Chuck Beatty <cbeatty@amadorgov.org>
Cc: Laura Allred <lallred2010@gmail.com>

Tue, Jul 7, 2015 at 8:41 AM

Amador County Planning Department,

This email is a response to the notice and request for opposition to the permit application located at 19580 American Flat Side Road.

Should you have any questions or need clarification please contact us at 245-3401, or directly on Elton's cell number 916-764-0621.

Thank you.

Elton and Laura Allred

cc: Chuck Beatty

3 attachments

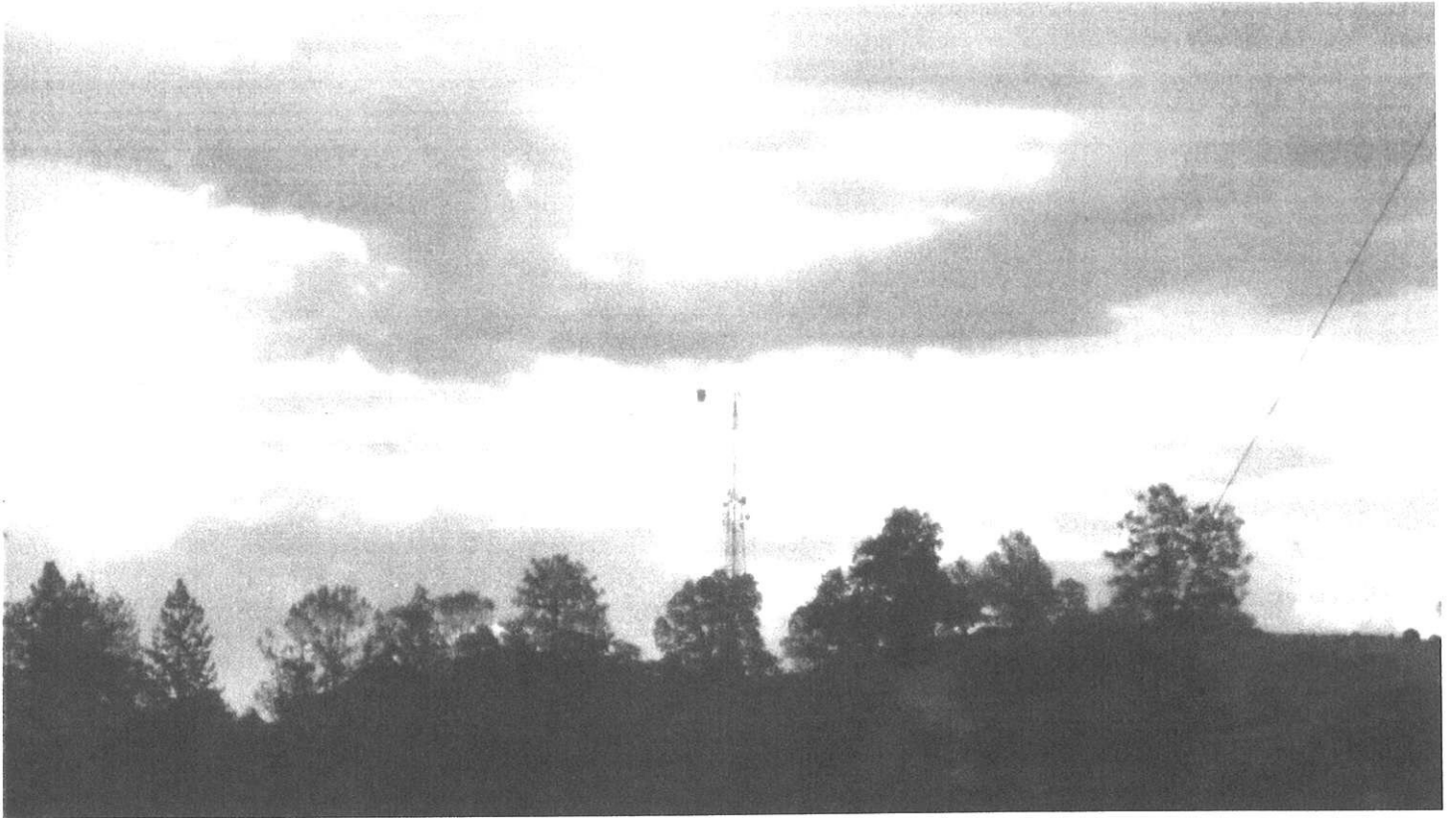


Verizon-Wireless-site-north.JPG
1145K



Verizon-Wireless-site-east.JPG
1145K

 **Verizon Wireless Monopole.docx**
28K



Elton and Laura Allred
19525 American Flat Side Road
Fiddletown, California 95629

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PLANNING DEPARTMENT

July 6, 2015

Amador County community Development Agency
Planning Department County Administration Center
810 Court Street
Jackson, California 95642-2132

re: 19580 American Flat Side Road, Assessor's Parcel Number : 015-020-016

To Whom It May Concern,

We are in receipt of The Epic Wireless Group, LLC/Verizon Wireless Commercial Wireless Service Facility Application notice. We do have concerns with the construction as proposed. Our concerns are to protect the character of our neighborhood, protect us and our guests from any new potential for health and safety hazards, and to maintain the visual quality of our adjacent property in Amador County.

Our first concern is set at 19.48.150, Section G Development Standards, 1, regarding "Aesthetic Considerations."

This section says that the structure "...shall take into consideration the aesthetic impact of the proposed wireless service facility and shall include conditions of approval to minimize the visual impact of the wireless service facility as seen from roadways and **other properties should any adverse effects be noted.**" [Emphasis added] Our view of said tower will be significantly more than the "Photosimulation" pictures submitted at road level. At road level the proposed position appears to be hidden by trees. However, at our home level, some 200 feet up in elevation, we most likely will have complete visual of the tower, which will affect the aesthetic condition of our neighborhood and our property, including property value. (See attached photos)

Our second concern is set at 19.48.150, Section G Development Standards, 2 "Screening" and 3 "Skyline."

Section 2 states in part, "[s]creening... visible from residential properties...shall be screened or camouflaged to mitigate adverse visual impacts." We see no provision for the screening or camouflage of the monopole tower as presented.

Section 3 says that the "... [f]acilities shall not adversely affect public views of skylines or **skyline views from other properties...**" [Emphasis added] By the documentation and photos provided we believe that the skyline will be obstructed from our property as required. Please see attached photos taken from our property.

Our third and final concern is set at 19.48.150, Section F Application Requirements, 3, regarding RF (Radio Frequency) Requirements.

This section says in part that the report "...shall include estimates of the maximum electric and magnetic field strength at the edge of the facility site, the extent that measurable fields extend in all directions from the facility." Our residence is at or near the same elevation as the panel-type antennas proposed by this application. The FCC website states that: "[c]onsequently, normal ground-level exposure is much less than the exposure that might be encountered if one were very close to the antenna and in its main transmitted beam." (See: www.fcc.gov/guides/human-exposure-rf-fields-guidelines-cellular-and-pcs-sites) And in our review of the "Waterford Radio Frequency Emissions Compliance Report For Verizon Wireless" we have growing concern for ourselves and our guests on our property. Because on page two under "Analysis" the report states: "The panel-type antennas to be employed at this site are highly directional by design and the orientation in azimuth and mounting elevation, as documented, **serve to reduce the potential to exceed MPE limits at any location other than directly in front of the antennas.**" [Emphasis added] Our property and residence will be in front of at least one of the twelve antennas pointing to the horizon, at or about the same mounting elevation, the beam will be piercing through our home. Therefore the Maximum Permissible Exposure (MPE) limits are likely to be exceeded.

The FCC website and the Waterford report both are telling us that our exposure could seriously exceed FCC requirements. The Waterford report states that "... at the antenna level, the maximum predicted power density level resulting from all Verizon Wireless operations is 59.228% of the FCC Occupational limit (**296.1% of the General Population limits**)." [Emphasis added] This excess power density level at the antenna beam height exceeds the General Population limit by 296.1%. So at ground level Waterford states the predicted power density level is 1.008% and at the antenna transmission beam it is 296.1%, our home is at the antenna transmission beam elevation and our property is approximately 1,100 feet from proposed monopole.

The terms "close" and "directly in front" are vague terms to understand in this situation. How far do the beams from the 12 proposed antennas reach? What are the degrees in the antenna beam width? At what point in the width and length of the beams do the Limits for General Population exceed the Maximum Permissible Exposure (MPE) limits? To our understanding the horizontal pattern of the 12 antenna is a complete 365° circumference. Some existing cell antenna beam widths can reach 66° in height. Some cell base towers can emit 12 to 22 miles depending on geography. Our property is close and directly in front of the proposed antenna beam(s) at around .218 miles. The Waterford report did not take into account our

circumstances and have failed to prove their proposed tower to be within FCC requirements.

There are numerous other elevated residences within the proposed antenna beam elevation. There were no "Photo Simulations" submitted as required from neighboring properties nor any data regarding the "... measurable fields extend[ing] in all directions from the facility" [Added text] for visual or FCC compliant safety requirements. The proponents have failed to prove that their tower is safe or within the safety requirements for the proposed tower location.

We have addressed our concerns with the recommendations in the Commercial Wireless Service Facilities Code, the FCC recommendations, and the Waterford report. We are additionally concerned about the effects of living directly in the proposed towers antenna main transmission beam for a considerable stationary period of time and on a daily basis. We are incorporating by reference the entire "INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS, DIVISION OF OCCUPATIONAL HEALTH, SAFETY AND MEDICINE, position on the Health Effects from Radio Frequency/Microwave (RF/MW) Radiation in Fire Department Facilities from Base Stations for Antennas and Towers for the Conduction of Cell Phone Transmissions" together with its resources for the position in this response. (See: <http://iaff.org/hs/facts/celltowerfinal.asp#n49>) The IAFF opposed "...the use of fire stations as base stations for towers and/or antennas for the conduction of cell phone transmissions until a study with the highest scientific merit and integrity on health effects of exposure to low-intensity RF/MW radiation is conducted and it is proven that such sitings are not hazardous to the health of our members." They state "[s]pecifically, there is concern for the effects of radio frequency radiation on the central nervous system (CNS) and the immune system, as well as other metabolic effects observed in preliminary studies." The U.S. Environmental Protection Agency stated in a July 16, 2002, letter, "Federal health and safety agencies have not yet developed policies concerning possible risk from long-term, non-thermal exposures. The FCC's exposure guideline is considered protective of effects arising from a thermal mechanism **[RF radiation from cell towers in non-thermal]** but not from all possible mechanisms. Therefore, the generalization by many that the guidelines protecting human beings from harm by any or all mechanisms is not justified." [Added text] We prefer consideration of prudent avoidance for health effects for which evidence is less than conclusive. Questions concerning the health effects and safety of RF radiation remain. While scientist investigate the health hazard of low intensity RF exposure, we do not want to be exposed to the serious health hazards that this radiation exposes and at antenna beam levels.

As an additional request we have the inalienable rights of life, liberty and the pursuit of happiness, stated in the Declaration of Independence, and restated in the 14th Amendment; we do not want our inalienable rights of life, liberty or happiness abrogated. Including but not limited to our health, property value (economic impact of a cell tower in close proximity), and enjoyment of our life and property. Please give this your utmost consideration.

In summary, we have noted that the aesthetic considerations, screening and skyline requirements are deficient to the development standards in the Planning Department notice. And most importantly the Radio Frequency requirements are of serious concern. Because, while most towers are elevated above ground levels limiting exposure to the tower Radio Frequencies, the proposed tower is at the elevation of our home and living/sleeping area. The FCC and the Waterford report both state that the elevated exposure to the antenna and in its main transmitting beam increases exposure to RF/microwave safety standards. We ask that the Amador County Planning Director consider denying this permit based on the facts set forth in this response. It would be unsafe for the tower to be erected as proposed with the uncertainty of the health and safety effects of low intensity Radio Frequency exposure at unknown or any level.

Thank you.

Elton and Laura Allred

Attachments:

INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS, DIVISION OF OCCUPATIONAL HEALTH, SAFETY AND MEDICINE, position on the Health Effects from Radio Frequency/Microwave (RF/MW) Radiation in Fire Department Facilities from Base Stations for Antennas and Towers for the Conduction of Cell Phone Transmissions

Source: <http://iaff.org/hs/facts/celltowerfinal.asp#n49>

Photos of skyline (north view and east view) of the proposed site from our residential property