

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Implementing the Infrastructure Investment)	GN Docket No. 22-69
and Jobs Act: Prevention and Elimination of)	
Digital Discrimination)	

REPLY COMMENTS OF ADVOCATES FOR THE EMS DISABLED

Children’s Health Defense, Susan Foster, Medical Writer, Fire & Utility Consultant;
Odette J. Wilkens, President & General Counsel, Wired Broadband, Inc.; Frank Clegg, (formerly,
President of Microsoft Canada), Canadians for Safe Technology; Arizonans for Safe Technology;
5G Free California; Desiree Jaworski, Executive Director, Center for Safer Wireless; Kent
Chamberlin, PhD, Former member of the NH Commission to Study The Environmental and
Health Effects of Evolving 5G Technology; Californians for Safe Technology; Coloradans for
Safe Technology; Paska Nayden, Connecticut for Responsible Technology; Cynthia Franklin,
Director, Consumers for Safe Cell Phones; Ms. Antonella DiSaverio; Ms. Eva Bortnick; Families
for Safe Technology.org; Howard Goodman, Esq.; Safe Technology Minnesota; Ms. Karol
Kuehn; Keep Cell Towers Away, Elk Grove, CA; 5G Free Rhode Island; The Leto Foundation;
Maine Coalition to Stop Smart Meters; Mrs. Marie Molnar; Mr. Andrew Molnar; Napa
Neighborhood For Safe Technology; MA for Safe Technology; Mrs. Pamela Wallace, Director,
Safe Tech Forward Michigan; New Hampshire for Safe Technology; New Yorkers 4 Wired Tech;
Oregon for Safe Technology; Eugene J. Bazan, PhD, Secretary, PA Smart Meter Work Group;
Pennsylvanians for Safe Technology; Stephen R Dahl, Director, Rhode Islanders for Safe

Technology; Safe Tech International, Safe Tech 4 Santa Rosa; Virginians for Safe Technology; Toxics Information Project; Ms. Anne Wilder, Priest River, Idaho; Ms. Donna Romo; Mark Wahl, Director, Citizen League Encouraging Awareness of Radiation of Whidbey Island, WA; Manhattan Neighbors for Safer Telecommunication; ElectromagneticHealth.org; Lendri Purcell, Founder, Families Advocating for Chemical and Toxics Safety; Ms. Linda Dance; Lex Kisteneff, CEO & Founder, The South Carolina Coalition for Wireless Safety Standards s; mocoSafeG.org in Montgomery County, MD; and Last Tree Laws (hereafter “Advocates for the EMS Disabled”) submit these Reply Comments in in the above-captioned proceeding.

The Initial NPRM Comments by Advocates for the EMS Disabled argued that (1) the definitions of “consumer” and “subscriber” should include the EMS Disabled; (2) digital discrimination characteristics should include disability; (3) Commission rules and policies that foster and exacerbate digital discrimination of the EMS Disabled must be re-examined and reversed; (4) digital discrimination of access against the EMS Disabled must end and the EMS Disabled must be afforded “equal access”; (5) fiber optics should be given priority for the EMS Disabled; and (6) there should be a dedicated portal for consumer complaints related to digital discrimination. The Advocates for the EMS Disabled also incorporated the points they had made in the NOI phase of this proceeding.¹

The Commission should always prioritize “to the premise” fiber solutions and rely on wireless only when wired is technically or economically infeasible or the main purpose is mobility. If the Commission is sincere about achieving “diversity, equity and inclusion” it ***must***

¹ The NPRM initial comments incorporated the NOI filings by reference. For ease of access those filings are attached to these Reply Comments.

recognize the specific concerns of the EMS Disabled and take the kind of special measures to address it that are within its regulatory remit. There must be an allowance for RF-free “safe zones” in public spaces and buildings to ensure inclusion in public life. The Commission can and should establish such zones, or at least allow local and state authorities to do so without threat or fear of litigation on preemption grounds.

With our Reply Comments, the Advocates for the EMS Disabled – as we did in the NOI round, will summarize and highlight filed comments from individuals who have experienced Electromagnetic Sensitivity (EMS) – the malady comprising a constellation of neurological symptoms, also referred to as Electrosensitivity (EHS).

As of April 14, 2023, a noteworthy 631 “express” and 5 “formal”² public comments by the public in response to the NPRM referenced EMS disability and asked the Commission to protect those who suffer EMS from undesired and harmful RF exposure. This topic was by far the most discussed issue by express commenters – actual citizens, those this Commission is supposed to be working for, rather than those who typically roam the FCC’s halls. This level of true “public” involvement shows the level of both harm and public concern. The shocking statistics tell us why more and more are actively asking for relief. The U.S. population is 332.4 million, and here are the numbers being harmed:³

Percentages	Number of U.S. EMF Sensitive/Disabled
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² We define “express” comments as those where the commenting party directly supplied text through the ECFS portal and “formal” comments as those that contained a separate attachment with the content.

³ Population numbers derived by applying Bevington, M. [The Prevalence of People with Restricted Access to Work in Manmade Electromagnetic Environments](https://mdsafetech.files.wordpress.com/2019/10/2018-prevalence-of-electromagnetic-sensitivity.pdf). (2019) J Environ Health Sci 5(1): 01- 12. Copyright: ©2019 Bevington, M., available at <https://mdsafetech.files.wordpress.com/2019/10/2018-prevalence-of-electromagnetic-sensitivity.pdf>.

Can't work – 0.65%	2.16 million
Severe symptom – 1.5%	4.99 million
Moderate symptoms – 5%	16.6 million
Mild symptoms – 30%	99.7 million

EMS DISABLED – IN THEIR OWN WORDS

J. Adamo's written comments⁴ state what is increasingly becoming apparent to the public:

Electromagnetic Sensitivity (EMS) is a valid medical condition in which individuals exposed to radiofrequency (RF) radiation from cell towers, WiFi, smartphones, smart meters and other wireless devices experience adverse health effects or worsening of existing health conditions. It can be extremely disabling and it is a discrimination against these individuals for the FCC not to recognize this. I and many others believe this is grounds for legal discrimination. With cell towers forced upon our cities and towns throughout it can leave EMS individuals excluded from public places that are drenched with Radio Frequency.

The cell towers being forced upon neighborhoods without a choice are even a worst discrimination for the RF-sensitive and especially for those with EMS disabilities as they are adversely affected within their own homes.

The Canadians Educators for Safe Technology (CE4ST)⁵ written submission makes similar points as the Advocates for the EMS Disabled. The CE4ST comments also include personal testimony in Appendix B:

Feeling poisoned every day, unable to function or participate fully in life, electromagnetically sensitive/electromagnetically disabled people like me are forced to retire early, or take unpaid medical leave or short-term leave, to regain their health.

Texts, send a sharp pain to the posterior part of my head, and subsequent, building head pressure and latent migraines occur the next day (like a hangover) which can last for hours or days. When I am exposed to wireless signals from small wireless antennas, or large cell towers, cell phones, wireless routers, fit bits, tablets, T.V. remotes, etc. I

⁴ Comments of J. Adamo, April 6, 2023, <https://www.fcc.gov/ecfs/search/search-filings/filing/104062712013998>.

⁵ Canadian Educators for Safe Technology, March 24, 2023, <https://www.fcc.gov/ecfs/search/search-filings/filing/10325112714814>.

experience moderate, severe, or debilitating symptoms depending on my proximity to the wireless source, signal strength and duration of exposure. Intolerable symptoms prevent me from accessing essential services or participating fully in society.

The express comments addressing this topic are too numerous to individually list, but many of them provide even more personal stories. Here are just a few”

I have a family member who suffers greatly being just in the same room with a single cell phone turned on. She gets heart palpitations, flu symptoms, headache, blurred vision, dizziness, and muddled thinking. She can't go anywhere these days without feeling sick and terrible. I know a couple of men who get tinnitus. Several friends complain about their symptoms. And many people complain of feeling "fried" by wireless devices, which are literally everywhere. Apparently everyone's body is affected negatively, whether one feels it or not. The brains of babies and infants in the womb are extremely vulnerable to wireless devices. It is just wrong to force people into having things like wireless smart meters installed in their homes with no opt out possibilities. They are forced to pay for something that will hurt them, and too often there is no recourse, no opt-out. We are like frogs in slowly heating water, and no one seems to care. I believe that forcing exposure – even as part of a genuine effort to afford broadband access – is itself a form of discrimination as a matter of law. More importantly, it is fundamentally inequitable because it leads to great harm: people with severe symptoms are functionally excluded from public participation since almost all public spaces are flooded with RF, and those with wireless facilities nearby cannot even take refuge in their homes.

[Janet Tache](#), March 28, 2023

The injured lose their civil rights and access to medical care, the legal system, and government. They are no longer able to walk into City Hall, a courthouse, a library, a bank, or a hospital. They are no longer able to go shopping for food or clothing. Every store is off limits due to the radiation from wifi and cell phones.

Any additional exposure to radiation robs the victims of the rest of their ability to use any electricity or electrical devices. It crashes their immune system, destroys the rest of their physical and mental health, and finally ends their lives.

The FCC has a chance to prevent this tragedy before it unfolds all across these United States, afflicting the people our Federal Government is supposed to protect, devastating the health, safety, and welfare of this great nation.

It takes a certain fearlessness to turn the tide of events and shape the course of human history. We urge you to have the courage to prioritize “fiber to the premises” solutions. We demand that you recognize and accommodate the victims of Microwave Radiation Syndrome and those who are EMS disabled.

[Michael Muadin, President, The Alliance for Microwave Radiation Accountability, Inc.](#), March 21, 2023

I never thought my life would be completely turned upside down after being disabled by wireless technology. I used to LOVE technology. I worked for a telecom and had every new device. I also was exposed to a lot of cellular, wi-fi, bluetooth, cordless phones etc. I started to experience burning nerve pain and muscle spasms and knots as well as extreme anxiety and depression with no known cause. Over the years 2011-2019 I got worse and worse with chronic insomnia, tremors, restless limbs, weakness, appetite loss, digestive issues, chronic pain, tinnitus, Blood pressure issues low and high, racing heart, excessive sweating, vertigo and so much more.

The office I worked in had industrial Wi-fi routers everywhere as well as 3G and 4G installed on the roof. There were a stream of ambulances called to this office on multiple occasions and we had no idea why so many “healthy” people needed ambulances at work. Before we moved to the top floor where my exposure was the highest, a man of 50 years old in good health, died suddenly at work of a heart attack. He worked on the top floor. 4G LTE had just been installed some months prior. On the top floor it was during this 3 month period where I received the highest amount of RF exposure at work. I experienced intense pressure in my eyes and head with burning nerve pain, red face that felt like sunburn, ringing in my ears, all over head hair loss (about 50% of my head of hair in 3 months) and awful heart palpitations that started a few hours after exposure. They would start slow and gain momentum. They were pounding like drum by the time I left work and they slowly went away at home for the next 3-4 hours. Until the next time I am exposed to wireless. The pain comes first intermittently in my head and sharp ear pains then my heart starts to get palpitations and BP increases or decreases and I can collapse and black out. It happened at work under the 3G antenna. I heard my skull cracking as it expanded and swelled from pressure and I collapsed and starting vomiting in a bucket. I don't know how I got to my car because I blacked out.

After the move to the top floor I only lasted 3 months and had to get out of that building to a different office location without towers. We moved to the top floor in late September and by early December I was so rundown with radiation my immunity dropped and I was knocked out for 2 weeks with a bad cold. I generally never catch colds or flu. This radiation wrecked me. The damage from wireless radiation is cumulative.

Cumulative damage means it's happening whether you know it or not. Every exposure pushed me over my tolerance and it's happening daily to more and more people since more powerful frequencies have been turned up. We have layers of 3G from various carriers, TDMA, CDMA, and then we have 4G LTE and again multiple frequencies and carriers. On top we have 5G mm wave and Nationwide 5G with further in-building penetration. This is what pushed many people over the top. Since the day I started feeling pain near wireless my life has been a nightmare. It happened at a jury duty pool of 300 other people all streaming and using their devices all around me for hours. After about an hour I started having sharp head pains like an ice pick to my temple. Then heart

palpitations started. They got stronger and stronger and I felt like I was going to have a heart attack. I sat there frozen afraid to say anything because I knew it would sound incredible strange. After more than 3 hours I had to say something. They looked up my issue and they dismissed me due to the RF microwave radiation causing my heart palpitations (like a microwave affects a pacemaker) and I cried all the way home, realizing how small and difficult my life would be if I couldn't be around other people or near towers, Wi-fi...

After leaving the high RF office I thought I would be OK as long as I stayed away from towers. But as I learned at jury duty 4 years later following my chronic exposures at work I started having sharp pains in my temple near anything wireless. I became sensitive also to electric and magnetic fields which also causes pain, numbness and tingling and cognitive impairments. I was driving a Tesla and it made me feel even worse after that day. I had to sell it. I suffered oxygen loss that lasted several days from the effects from the intense wireless exposure I got. I was gasping for air at night in bed (night is when the body goes into restore/healing mode and it makes people more sensitive). This happened for at least 4 nights. The oxygen loss comes from rouleaux formation Red Blood cells that become thick or clumpy near EMF... it results in cognitive impairments like short term memory loss, poor decision making, trouble with new learning, attention and focus and getting stuck in fight/flight/freeze. Magda Havas renowned researcher has shown how RF affects the blood, autonomic nervous system and heart. <https://pubmed.ncbi.nlm.nih.gov/24192494/> My endocrine system stopped working correctly. After two weeks following jury duty I had lost 20 pounds. My weight loss continued for several months at 85 pounds or less as I stopped looking, afraid. My normal weight was 115-125. My body was demineralizing and not absorbing water. I was dying slowly from radiation sickness.

If I have to go to a medical appointment or almost any other place including outdoor places (like outdoor gardens, zoos, or historical places) they are almost always saturated with high and extreme levels of radiation as detected on the Safe and Sound Pro II meter. My home is an average of 0.4 to 10 W/m² (green indicator). At a beach nearby the level is a constant red peaking 100, 300 to over 700 (Red indicator for extreme). This environment has induced migraines, palpitations become sick and vomiting. Most people's newer 5G phones will be over 200,000 W/m². Same for wireless printers, computers and even bluetooth powered games and toys. Driving on a US highway the meter picked up over 500,000 W/m². And there is no wireless in our vehicle.

Places with low signal are disappearing quickly and we have a right to be outside in the world free from being radiated. Elon Musk is planning on polluting the sky with 7 thousand low orbit 5G satellites blanketing the entire planet in RF radiation causing more illness and disability. I do not consent. Do you? For your pets, kids, grandkids??? Where does it end? No one should have to feel this way from wireless pollution. And make no mistake it is pollution blasting out of the towers, bathing the entire landscape with

dangerous levels of Pulsed Microwave Radio-Frequency. Trees, plants, birds, bees, and more are being disrupted and harmed by the towers. Birds and bees and other insects are not migrating accurately because their own electrical magnetic navigation is disturbed by the artificial harmful frequencies. We have seen a 70% insect decline in populations and bee colonies collapse when they cannot find their way back to the hive. We have no time to lose by ignoring this issue.

Telecoms are the Tobacco companies of yesterday. They are using the same tactics and the damage being done to our bodies, minds and DNA is catastrophic. There are plenty of scientific studies. Thousands of reports showing cancers and neurological issues, heart issues and every organ in the body is affected. We are seeing epic levels of anxiety, depression, fibromyalgia, cancers, heart issues in younger children... This is no surprise when you are being slowly microwaved 24x7 at home, at school, in the car, at the store... They use RADAR in some stores to monitor store aisles, radiating people, with a known carcinogen! How is this legal? Towers pose another threat to food and water nearby. If you have Wi-fi and radar, and towers etc the land and soil microbiome are affected. Food inside markets also loses nutrition from being radiated in shipping or just the constant Wi-fi making food less vital. For the first time recently it was announced that life expectancy has decreased! No surprise. And we know fertility is a big issue because cells are affected and harmed by RF radiation.

I never thought my life would be stolen from me because I can't be around anything wireless. People are being isolated and it's a burden on the entire country when we can't work or participate in society. There are support groups and the numbers are growing quickly in recent years. There are millions of people affected worldwide. At the "conservative estimate" 3-10% of the population of the US (Total estimate 330,000,000) that would equal 9,900,000 to 33,000,000 people conservatively! There are at least 3-15% of the worldwide population who have become sick like me. And many more are becoming affected and developing all kinds of POTS, long Covid, chronic fatigue, ADHD, Autism and more.

For those who figured out what is causing their issues we are stuck at home almost all the time. We have so few places we can go. It is the saddest existence. Even the beaches near me have become so full of RF radiation from towers and nationwide 5G that if I spend more than a few hours I end up having a terrible migraine with brain swelling and I end up vomiting for hours. I have to wear heavy clothing lined with silver fibers to reduce signals. I have to wear long sleeve cotton under the shirts and cotton leggings under that so the silver doesn't touch my skin. I have a beanie to cover my head and ears. Leaded glass eyewear for my eyes. These clothing pieces are extremely expensive and they can't even be washed regularly because they will degrade. I sleep in a faraday tent with silver mesh to block any RF from satellites, neighbor's devices and towers.

In 2021 we had to sell our dream home to move to a more rural area away from towers but they are popping up all the time. There is a new tower that just sprang up across the street from my doctor. The hospital has 4G masts all over the roof. They are erecting a new giant tower near the last “safe” beach in my area. That’s the last place I can go and feel good out in public (if I can stay farther enough from people with their devices). It’s incredibly sad seeing the walls closing in and feeling like you will not have any meaningful existence. There are almost no businesses without wireless (salon, museums, restaurants, concerts, hotels, airplanes, etc) Where can we be safe? I pleaded with Plymouth Plantation to have a few hours where they might turn Wi-Fi off so I could spend a day outdoors and enjoy the historic place where they pretend it’s 1620. They advised me that a visit would not be recommended and they are unable to turn Wi-fi off. Can you imagine? I have lost my savings trying to get well, trying to protect myself. Now I am afraid every day a new tower, antenna or strong neighbor's device will be the end for me.

The United States has some of the highest allowable RF limits in the world, but no one thinks of the cumulative effect when you have millions of people around you with their 5G phones that have probably 10 antennas or more inside and add their Fitbits, apple watches, tablets, smart connected cars, AirPods, wireless medical devices, hearing aids, alarm systems, more powerful bluetooth and intense wi-fi routers... It's too much exposure. Towers have multiple carriers so the limits really need to be reduced greatly and the culture can move toward ethernet and wired connections in home and work environments, using less wireless for tasks except as needed. Apparently cell phones are even more addictive than heroin so there needs to be some work to reduce people's exposure. All I am asking for is safe places for people to live without towers close by, lower RF limits imposed and safe places for medical treatment without antennas on the roofs and outside the facilities. Sensitive populations must be protected. ...

[L. Decristofaro](#), March 14, 2023

Both myself and children have chronic Lyme which has made us EMF sensitive. Currently we are looking for a place to move to where we can have less impact from the chronic health conditions we suffer made worse by emf in our environment. We even had to send our children at great expense and sacrifice to a Waldorf school which has no technology or WiFi swirling all day at school in order to mitigate the negative effects of Emfs.

[Kimberly Fischer Bunyan](#), March 9, 2023

These comments, along with those highlighted in the Advocates for the EMS Disabled NOI filings, provide pointed, poignant pleas for relief. These citizens are being hurt by the FCC policies and regulations. They deserve both recognition and accommodation. The Commission

must finally accept that people's health and very lives are at risk and begin to do something about it, starting here.

CONCLUSION

The final rules, policies and actions flowing from this proceeding must (1) ensure that the definitions of "consumer" and "subscriber" include the EMS Disabled; (2) digital discrimination characteristics should include disability; (3) Commission rules and policies that are exacerbating digital discrimination of the EMS Disabled must be re-examined and reversed; (4) digital discrimination of access against the EMS Disabled must end and the EMS Disabled must be afforded "equal access" (5) fiber optics should be given priority for the disabled; and (6) there should be a dedicated portal for consumer complaints related to digital discrimination.

Respectfully Submitted,

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The following groups and individuals have granted permission to counsel to submit these Reply Comments on their behalf under the name of "Advocates for the EMS Disabled":

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Grove, CA; 5G Free Rhode Island; The Leto Foundation; Maine Coalition to Stop Smart Meters; Mrs. Marie Molnar; Mr. Andrew Molnar; Napa Neighborhood For Safe Technology; MA for Safe Technology; Mrs. Pamela Wallace, Director, Safe Tech Forward Michigan; New Hampshire for Safe Technology; New Yorkers 4 Wired Tech; Oregon for Safe Technology; Eugene J. Bazan, PhD, Secretary, PA Smart Meter Work Group; Pennsylvanians for Safe Technology; Stephen R Dahl, Director, Rhode Islanders for Safe Technology; Safe Tech International, Safe Tech 4 Santa Rosa; Virginians for Safe Technology; Toxics Information Project; Ms. Anne Wilder, Priest River, Idaho; Ms. Donna Romo; Mark Wahl, Director, Citizen League Encouraging Awareness of Radiation of Whidbey Island, WA; Manhattan Neighbors for Safer Telecommunication; ElectromagneticHealth.org; Lendri Purcell, Founder, Families Advocating for Chemical and Toxics Safety; Ms. Linda Dance; Lex Kisteneff, CEO & Founder, The South Carolina Coalition for Wireless Safety Standards; mocoSafeG.org in Montgomery County, MD; and Last Tree Laws.