

**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; Kent Chamberlin,
PhD, Former member of the NH Commission to Study The Environmental and Health Effects of
Evolving 5G Technology; Californians for Safe Technology; Julie Levine, 5G Free California;
Coloradans for Safe Technology; Larry Ortega, Community Union, Inc.; Paska Nayden,
Connecticut for Responsible Technology; Ms. Eva Bortnick; Howard Goodman, Esq.; Safe
Technology Minnesota; 5G Free Rhode Island; ; Napa Neighborhood For Safe Technology;
Massachusetts for Safe Technology; New Hampshire for Safe Technology; New Yorkers 4
Wired Tech; Pennsylvanians for Safe Technology; Stephen R. Dahl, Director, Rhode Islanders
for Safe Technology; Safe Tech International; Sidnee Cox, Windsor, CA; Safe Tech for Santa
Rosa; Virginians for Safe Technology; Mark Wahl, Director, Citizen League Encouraging
Awareness of Radiation of Whidbey Island, WA; Lendri Purcell, President, FACTS (Families
Advocating for Chemical and Toxics Safety); Ms. Linda Dance, Engineer; Lex Kisteneff, CEO
& Founder, The South Carolina Coalition for Wireless Safety Standards; mocoSafeG.org in
Montgomery County, MD; Kirstin Beatty, Director, Last Tree Laws Massachusetts, Holyoke,
MA; Josh Hart, Director, StopSmartMeters.org; Pittsfield Cell Tower Injured and Concerned

Citizens; Liberty Goodwin, Director, Toxics Information Project (TIP); Richard Thom; Tracey Roizman, DC, Asheville, NC; Hank Allen, Idahoans for Safe Technology; Margaret Phillips, MA, MPH; Flo Mitchell Kosik; Grace Shen, Physical Therapist; Shawn Hutchens, CEO of Green Fields Trading Co Inc., Lake Station, Indiana; Friends of Merrymeeting Bay (FOMB); Maine Coalition to Stop Smart Meters; William Now, Carmichael, CA; Barbara Payne, President, Electromagnetic Pollution Illnesses Canada Foundation (EPIC); Keldwyn Teves, Artist & Writer, Fletcher, NC; Janet FitzGerald, Sharon MA; Patricia Burke, EHS Disabled, Journalist/Advocate, Millis, Massachusetts; Monique Maisenhalter, SWORT Board Member, SW Ohio for Responsible Technology; Nancy Perlman, Glen Ellyn, Illinois; Diane Douglas, Licensed Occupational Therapist, Fairview, NC; Sharon Behn, Arden, NC; Tais Howard LAC, MAOM, Dipl. O.M. (NCCAOM); Natalie Sadler, MD, Holistic Psychiatry; Nancy Van Dover BA, DVM, OMD, Dipl Acup; Cynthia Franklin, Director, Consumers for Safe Cell Phones; Andrea Mercier, Mother; Cheriell Jensen; Mark Graham, Keep Cell Towers Away, Elk Grove, CA; Michael Muadin, President of AMRA, Alliance for Microwave Radiation Accountability, Inc., East Chatham, New York; Malibu For Safe Tech; Shannon Shine, Rocky Mountains for Safe Technology; Ann K. Friday, Relocate the Cell Tower Group, Prescott, AZ; Stephanie Thomas, Phoebe Ann Thomas Sorgen (Co-Founder), Soula Culver, Sarah Aminoff, Meaveen O'Conner, Sandy Nixon, Connie Anderson, Members, WiRED, Berkeley, CA; Luanne Moore, Boynton Beach, FL; Glen Ellyn VHP, Glen Ellyn, IL; Debra Green, Safe Tech Hawaii, Kihei, Hawaii; Shane Riley, 5G Free Oregon, Portland, OR; Keep Oregon for Safer Technology; Ellen Marks, California Brain Tumor Association, Indian Wells, CA; Frederick P. Sinclair, Jr., Alfred, NY; Cynthia Rahav, Berkeley, CA; Susan Jennings, SW Pennsylvania for Safe Technology, Mount Pleasant, PA; Lisa C. Smith, Safe Tech Tucson, Tucson, AZ; Linda Smith, EMF

Wellness Tucson, Tucson, AZ; Scott Tips, President & General Counsel, National Health Federation (hereafter “Advocates for the EMS Disabled”) submit these Reply Comments in in the above-captioned proceeding.

The Advocates for the EMS Disabled made two principal points in their Comments. First, 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. Second, if the Commission is sincere about achieving “diversity, equity and inclusion” it ***must*** recognize the specific and profoundly deleterious effects of Radiofrequency Radiation (RFR) on the EMS Disabled and take immediate, full force-measures within its regulatory remit to address and solve this growing plight. 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. To fail to seek accommodation for this growing population of EMS Disabled is to facilitate, albeit unintentionally, the direct opposite of the stated goal of achieving diversity, equity and inclusion.

To illustrate the need for accommodation, the Advocates for the EMS Disabled offered in their May 16, 2022 filing with the FCC four (4) real-life accounts of individuals who have suffered EMS disability as a result of exposure to wireless radiation. Two of these cases were individuals who had cell towers placed in front of or within close proximity of their homes, one a macro tower and one a small cell. The other two individuals suffered disabling EMS symptoms after rooftop antennas were placed on the apartment buildings in which they lived. With these Reply Comments, the Advocates for the EMS Disabled summarize and highlight a sample of 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 June 28, 2022, there were 333 comments listed by ECFS the FCC in GN Docket No. 22-69. Among those 333 comments, 50.15 percent, more than 50 percent of the respondents, requested fiber to the premises (FTTP). More than 62 percent advocated that the EMS Disabled be accommodated with fiber to the premises and wireless-free zones. 65.17 percent stated they suffered from EMS disability or their family members and/or friends experienced symptoms of Electromagnetic Sensitivity.

FIBER TO THE PREMISES AS A SOLUTION

More than 50 percent of the commenters took the time to argue for a “fiber first” preference, similar to that recently adopted by NTIA in its Broadband Equity, Access and Deployment (BEAD) program Notice of Funding Opportunity.¹ Here are a few excerpts:

Prioritize fiber to the premises (FTTP) solutions. The goal should be to bring fiber as close to the user as possible, to use a copper tail for short distances where necessary, and to resort to wireless technology as a last resort due to health implications of wireless. There must be an allowance for RF-free “safe zones” in public spaces and buildings to ensure inclusion in public life. Individuals who cannot be around RF must have the ability, as a matter of right, to obtain wired (fiber-based) broadband. Discriminating against vulnerable populations, such as those with EMS, is unconscionable and is not consistent with the goal of achieving “diversity, equity and inclusion.” I urge the FCC to do everything in its power to halt any further discussion of expanding wireless services, recognize this specific problem and take special measures that are within its duty/regulatory authority to effectively address it and use fiber as an alternative.

[Tracy C Schlanser, June 6, 2022](#)

Please do all you can to enable fully WIRED TECHNOLOGY for all places, private and public, including Schools, Libraries, Hospitals, Universities, and more. This is a CRUCIAL matter to very many people.

[Martha Glaser, June 9, 2022](#)

Hello Thanks for the opportunity to comment. Science begins with our collective experiences (what is known) combined with logic & reason. As an engineer in the

¹ The BEAD NOFO is available at <https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf>.

telecom industry, I spent about 7 years (in the 1990s) designing & testing telecom equipment to meet the industry's requirements. The operating companies require equipment to limit RF emissions as well as be resistant to RF energy. The only reason for this is to not interfere with other electronics and intentional RF transmissions, including those in telecom. To pass the resistance tests the traffic must not have any bit errors when bombarded with RF at various frequencies & power. I learned that cell phones could create bit errors if the equipment could not pass the tests. It was at that time I realized that if cell phones could impact these shielded electronics which function at milliamp and low voltages (3v/5v/12v), how could they not impact living organisms where our electrical systems are in the millivolt & microamp range. Simple logic dictates that there must be some effect on living organisms without the shielding of the telecom equipment. In addition, RF was also known for its ability to excite molecules (one result is creating a heating effect). This could not be good for organisms either. Science dictates RF must have a negative effect on humans. While our experience can give us some good ideas of these negative effects, only research could give us the actual details of what these effects are. I came to learn there was a good deal of research from other countries during the early days of radar and in recent decades a great deal more research has been added. The FCC must be aware of this, no? Being exposed to so much RF humans are being harmed in many ways, so it's time to finally acknowledge this. You can no longer ignore the growing amount of evidence by many reputable scientists & organizations around the world. It's time to put fiber optic communications first, ahead of RF and 5G!

[Anthony P Notos, June 27, 2022](#)

Please build a broadband network with fiber optic cable to homes and businesses, rather than 5G. Fiber optic is better and safer in every respect. Fiber optic is faster, uses less energy, does not emit potentially hazardous radiation, and does not create a visual blight in our cities with ugly 5G transmitters located on every telephone pole. Please be smart and implement a fiber optic broadband system!

[Eben Fodor, June 7, 2022](#)

I am extremely concerned that the FCC is making wireless rollout the chosen way to go instead of wired (fiber-based) broadband which should be the preferred mode of broadband delivery.

[Bibi Caspari, June 21, 2022](#)

People have a right to choose what forms of technology they use. It should not be forced by removing choices. Every person, especially the EMS-disabled, should have access to fiber-based /wired broadband. The 5G rollover was done with our money & without our consent.

[Cindy Kortlever, June 2, 2022](#)

Please stop the buildout of more towers and infrastructure now so that people like me can escape to rural areas (the only places we can feel normal and well again) and invest money in creating hardwired schools and public spaces.

[Jennifer Manzler, June 1, 2022](#)

Prioritize fiber to the premises (FTTP) solutions. The goal should be to bring fiber as close to the user as possible, to use a copper tail for short distances where necessary, and to resort to wireless technology as a last resort.

[Manuela Seitz-Hipkins May 31, 2022](#)

As someone who suffers from a wide variety of sensitivities, I urge the FCC to take into consideration all those with EMS and keep fiber first when doing the vital work of providing everyone with broadband services. Please always prioritize “fiber to the premises (FTTP)” solutions. The FCC should rely on fixed wireless only when fully wired is technically or economically infeasible, keeping the main purpose of mobile wireless as supporting mobility--not to be a substitute for wired fixed arrangements. Please also consider allowing for RF-free “safe zones” in public spaces and buildings to ensure inclusion in public life. Those who cannot be around RF must have the ability to obtain wired (fiber-based) broadband so that they may maintain equal access to technology as well. Thank you for ensuring everyone can safely make use of the technology we all need to participate in our current electronic society.

[Aleks Kosowicz May 30, 2022](#)

I am writing today to advocate for fiber to the premises (FTTP) solutions. The goal should be to bring fiber as close to the user as possible and to resort to wireless technology as a last resort. People who are RF-sensitive, especially those with EMS disabilities, must be allowed equal access to broadband in a form that does not threaten or worsen their health and well-being. Individuals who cannot be around RF must have the ability to obtain wired (fiber-based) broadband.

[Karol Olson, June 6, 2022](#)

While studies are still being conducted in this area, we know enough to use caution - since the long-term effects won't likely be known for many years. I am asking the FCC to protect our children - the future generation - through the use of fiber-based broadband, as opposed to running the risk of harming Americans by promoting wireless connectivity.

[Julie Ann Blowers, June 17, 2022](#)

Wired (fiber-based) broadband should be the preferred mode of broadband delivery and to finally recognize the need for special measures to address the electromagnetic sensitivity (EMS) disabled community.

[William Brobeil, June 17, 2022](#)

I must express my concern and demand for the option of wired broadband not only for the EMF DISABLED but for all those involved given the known risks of exposure.

[Roy Monsour, June 1, 2022](#)

The FCC should always prioritize “fiber to the premises (FTTP)” solutions. FTTP is the installation of optical fiber directly to individual homes, multi-dwelling units, schools, municipal buildings and businesses to provide high-speed broadband access. The FCC should rely on fixed wireless only when fully wired is technically or economically infeasible. The main purpose of mobile wireless is to support mobility, not to be a substitute for wired fixed arrangements. Those who are RF-sensitive and especially those

with EMS disabilities must be allowed equal access to broadband in a form that does not threaten or worsen their health and well-being. There must be an allowance for RF-free “safe zones” in public spaces and buildings to ensure inclusion in public life. Those who cannot be around RF must have the ability, as a matter of right, to obtain wired (fiber-based) broadband.

[Dr. Carol Taccetta, June 17, 2022](#)

THE NEED FOR ACCOMMODATION OF EMS DISABLED TO FULFILL PROMISE OF DIVERSITY, EQUITY AND INCLUSION

Some 62.16 percent advocated that the EMS Disabled be accommodated with fiber to the premises and wireless-free zones.

There must be an allowance for RF-free safe zones in public spaces and buildings to ensure inclusion in public life. Individuals who cannot be around RF must have the ability, as a matter of right, to obtain wired (fiber-based) broadband. Discriminating against vulnerable populations, such as those with EMS, is unconscionable and is not consistent with the goal of achieving diversity, equity and inclusion. I urge you to do everything in your power to halt any further discussion of expanding wireless services, recognize this specific problem and take special measures that are within your regulatory authority.

[Brent Rudolph, June 8, 2022](#)

Yes to access for everyone, but it must be #fiberfirst [t]o protect the health of the vulnerable. We oppose the cheaper, wireless rollout which emits toxic radiation 24/7. Medical literature has shown it to cause a variety of neurological and cognitive symptoms, oxidative stress, metabolic, hormonal and sleep disruptions among many other serious adverse reactions. There must be an allowance for RF-free “safe zones” in public spaces and buildings to ensure inclusion in public life. Those who cannot be around RF must have the ability, as a matter of right, to obtain wired (fiber-based) broadband.

[Erica Comerford, June 27, 2022](#)

There have to be WiFi/Cell and “smart” free zones set up as accommodations for people who are ElectroSensitive-Aware, ES-Injured, and ES-Sensitive. I believe I have been injured by being in a 2021 car purchased for newly driving family members, so cars also need to be able to be purchased that can be fully disconnected from Bluetooth, WIFI, Hotspots, and Cellular Data. The same will have to be true for train and airplane travel. I believe that forcing RF radiation 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 own homes. Please do all you can to enable fully WIRED

TECHNOLOGY for all places, private and public, including Schools, Libraries, Hospitals, Universities, and more. This is a CRUCIAL matter to very many people. Thank you.

[Martha Glaser, June 9, 2022](#)

There must be an allowance for RF-free “safe zones” in public spaces and buildings to ensure inclusion in public life. Individuals who cannot be around RF must have the ability, as a matter of right, to obtain wired (fiber-based) broadband. Discriminating against vulnerable populations, such as those with EMS, is unconscionable and is not consistent with the goal of achieving diversity, equity and inclusion.

[Erik Harper, June 7, 2022](#)

People who are RF-sensitive, especially those with EMS disabilities, must be allowed equal access to broadband in a form that does not threaten or worsen their health and well-being.

[Carlos Ralat, May 30, 2022](#)

I believe that forcing RF radiation 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 own homes.

[Miriam Eckenfels-Garcia, May 27, 2022](#)

I’m urging you to formally recognize electromagnetic sensitivity and set a firm precedent whereby high speed wired connections are the preferred means of installation.

[Michael Kaminsky, June 17, 2022](#)

People who are RF-sensitive, especially those with EMS disabilities, must be allowed equal access to broadband in a form that does not threaten or worsen their health and well-being. There must be an allowance for RF-free “safe zones” in public spaces and buildings to ensure inclusion in public life. Individuals who cannot be around RF must have the ability, as a matter of right, to obtain wired (fiber-based) broadband.

[George and Donna Machen, June 7, 2022](#)

I [] plead with the FCC to make accommodations for EMS-disabled citizens by creating and including ‘wireless-free zones’ in public places.

[Melia James, June 1, 2022](#)

Please have schools and daycares use fiber/wire for internet and not WiFi. The EMF levels in classrooms where children are for 7 hours a day are so high! They need to be protected from the range of symptoms that can come with EMF sensitivity.

[Jennifer, May 30, 2022](#)

Discriminating against vulnerable populations, such as those with EMS, is unconscionable and is not consistent with the goal of achieving diversity, equity and inclusion. I urge the FCC to do everything in its power to halt any further discussion of expanding wireless services, recognize this specific problem and take special measures that are within its duty/regulatory authority to effectively address it.

[Julie Ranieri, May 30, 2022](#)

The FCC should always prioritize “fiber to the premises (FTTP)” solutions. FTTP is the installation of optical fiber directly to individual homes, multi-dwelling units, schools, municipal buildings and businesses to provide high-speed broadband access. The FCC should rely on fixed wireless only when fully wired is technically or economically infeasible. The main purpose of mobile wireless is to support mobility, not to be a substitute for wired fixed arrangements. Those who are RF-sensitive and especially those with EMS disabilities must be allowed equal access to broadband in a form that does not threaten or worsen their health and well-being. There must be an allowance for RF-free “safe zones” in public spaces and buildings to ensure inclusion in public life. Those who cannot be around RF must have the ability, as a matter of right, to obtain wired (fiber-based) broadband.

[Erik Harper, June 7, 2022](#)

People who are RF-sensitive, especially those with EMS disabilities, must be allowed equal access to broadband in a form that does not threaten or worsen their health and well-being. There must be an allowance for RF-free “safe zones” in public spaces and buildings to ensure inclusion in public life. I urge the FCC to do everything in its power to recognize this specific problem and take special measures that are within its duty/regulatory authority to effectively address it.

[Paul Rauh, June 17, 2022](#)

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 own homes. It should be enough that people don’t want to be exposed to RF pollution with unknown harms. I am left wondering if my family’s health problems are caused or worsened by all the RF pollution, and we can’t opt out even to test whether it makes a difference.

[Kari Olsen, June 02, 2022](#)

This technology is making millions of Americans sick, and it is past time that it be recognized and addressed. I applaud the Federal Communications Commission’s (FCC) initial effort to place emphasis on “harms experienced by historically excluded and marginalized communities” and the desire for “meaningful policy reforms and systems improvements, as well as a framework for collaborative action to extend digital opportunity to everyone. There must be an allowance for RF-free safe zones in public spaces and buildings to ensure inclusion in public life. Individuals who cannot be around RF must have the ability, as a matter of right, to obtain wired (fiber-based) broadband.

[Greg Fedak, June 1, 2022](#)

Discriminating against vulnerable populations, such as those with EMS, is unconscionable and is not consistent with the goal of achieving “diversity, equity and inclusion.” I urge the FCC to do everything in its power to halt any further discussion of expanding wireless services, recognize this specific problem and take special measures that are within its duty/regulatory authority to effectively address it.

[Kitt E Stevens, June 27, 2022](#)

There must be an allowance for RF-free “safe zones” in public spaces and buildings to ensure inclusion in public life. Individuals who cannot be around RF must have the ability, as a matter of right, to obtain wired (fiber-based) broadband.

[Angela Dicianno, June 6, 2022](#)

I am an EMS disabled individual who would like to make it known that broadband/hardwired internet should be available, accessible, and the norm and having WiFi free zones, workspaces and SCHOOLS needs to happen. My son has an insanely enormous WiFi tower on his schools property. This can't be what children have to have. This can't be what is happening. Everything is being harmed by this.

[Patience Pecoraro-Nead, June 1, 2022](#)

We cannot commit to stakeholder expectations nor our mission statements without safe places for EMS people, I feel that is including myself. My workplace is a place for alleged healing and EMS people have a right to be protected as do staff and visitors. Transparency is key. People first then things then money. Your entire plans will go south when too many people are sick from your lack of due process. Thank you for taking these matters seriously and involving and including experts in matters like this.

[Sam Filer, Don Hall, June 1, 2022](#)

Many people's lives are being destroyed by the mass use of RF. The FCC “acceptable limits” are not based on biological effects, only thermal. Most countries have far lower limits. These EMFs can eventually cause permanent disability and leave a person with no means of participating in society. We need access to safe, wired technology and wi-fi free zones in public spaces. And you must stop putting wireless transponders into things that come into our homes that we cannot escape. I have Direct TV and even though it is completely hard-wired, there is a powerful transponder within the receiver that is impossible to shut off that makes me very dizzy and unable to concentrate. It took years to find out why I couldn't be near it. Many more items, like appliances, will soon contain these for Smart Homes, making life impossible, so we'll have to live without many staple items we've enjoyed since the beginning of the Industrial Age. The only reason it is being done is for money and profit, but the welfare of the people must come first.

[Beckie Takacs, June 1, 2022](#)

EMS is a real problem making people sick and disabled. There should [] be wireless free zones in public areas. This technology emits a toxin that significantly impacts the brain and other organs, triggering disabling headaches, ‘brain fog,’ vertigo, difficulty sleeping, skin rashes and a host of other symptoms. We should not ignore EMS because it is a

health threat to all of us including animals. There should be guidelines and safety measures and warnings for the public.

[Nancy Bender, June 1, 2022](#)

People who are RF-sensitive, especially those with EMS disabilities, must be allowed equal access to broadband in a form that does not threaten or worsen their health and well-being. There must be an allowance for RF-free “safe zones” in public spaces and buildings to ensure inclusion in public life. Individuals who cannot be around RF must have the ability, as a matter of right, to obtain wired (fiber-based) broadband.

[Fariha Husain, May 27, 2022](#)

EMS DISABLED – IN THEIR OWN WORDS

65.17 percent of the commenters stated they suffered from EMS disability or their family members and/or friends experienced symptoms of Electromagnetic Sensitivity. Their stories are compelling, and they cry for acceptance, equity, inclusion and relief from their suffering. In their own words:

I am a teacher and recently had to change schools due to reactions I was having from 2 cell towers put up in a community park right next to the school I work at. These towers are within 150 meters from my classroom. I understand the demand for better connectivity for the public but at what cost. I have experienced headaches, dizziness, brain fog, memory loss, and rash since in the classroom I am leaving this year. I also have students complain about headaches daily. Please look into the harmful effects these towers and the wifi in the classrooms may have on the teachers and students.

[Cheri Rose, June 1, 2022](#)

I am someone who has been diagnosed with Electromagnetic Hypersensitivity (EHS). This happened to me about 5 years ago when a SmartMeter was installed outside my bedroom window and I became very sick, unable to sleep at night (waking every hour suddenly), nerve pain, numbness, and cramping in my hand every time I held my cell phone, terrible tinnitus in my ears, anxiety and headaches, and nerve pain in my entire body. I have spent the past few years and a lot of money taking mitigation measure in my own home (hard wiring with ethernet connections, installing silver fabric screens over walls and windows, and purchasing shields to protect my body from the harmful wireless radiation waves) in addition to not using a cell phone except in emergencies and staying out of public wifi places. I have a difficult time even being in close proximity to someone using a newer stronger 5G compatible phone. Please recognize this condition that is making people sick and affecting more and more Americans every day because of the density of wireless radiation in our country and the proliferation of 4G/5G towers in our communities.

[Jennifer Manzler, June 1, 2022](#)

As a nurse with a diverse background of clinical experience, I, along with 3500 members of our group, “citizens for 5g awareness” are imploring you to take into account the disabilities and adverse symptoms that are a direct result of involuntary wireless radiation exposure, and act to remove and reduce cell panels, towers, and other impacting technology that is at fault along with the companies that have allowed this to continue. I myself have developed debilitating PVC’s and subsequent weakening of the ventricles of the heart after a small cell was constructed down the block from my home. While it has severely impacted my life, I want to use the opportunity to educate and advocate on behalf of myself, others going through similar experiences, and those who do not yet have symptoms but soon very well may, as exposure continues unchecked.

[Sara Lobato, June 1, 2022](#)

Because of where I live, I must use a 5g device from T-Mobile. This device when turned on, within minutes induces headaches, ear ringing, and nausea to name a few. I can’t work from home or connect to the outside world with this.

[Jason Diponio, June 1, 2022](#)

I am EMS-disabled. My symptoms started "years ago" & long before I even knew what EMS meant or was. The roll-out of 5G has literally, physically sickened me to the point that in the near future I will be forced to barely leave my home. I suffer from nausea, sometimes extreme, headaches, sometimes "stabbing" headaches while traveling past cell towers, tingling in my brain, tinnitus, difficulty sleeping at night, rapid heartbeat & now joint pain in hips & hands when exposed to WiFi in public places where I'm shopping including but not limited to: COSTCO (bad symptoms) Whole Foods (bad symptoms), Folsom City Zoo (they added new antennas inside zoo!), Church, Crunch Fitness, 24 Hour Fitness, my car dealership for service (WiFi antennas everywhere), coffee shops & even movie theaters! I feel like my life has been stolen from me. I was very active in Church, Gym, regular movie goer, restaurants, Folsom and Sacramento City Zoo memberships and much more. I believe in my local city economy which I've supported until recently. Since the roll-out of 5G approx 3+ months ago, I've been robbed of enjoying church, movies (gone to movies 60 yrs---a passion), and if gym is crowded I have to leave. I no longer attend Church & this is extremely upsetting to me! I'm even being Wii's from all my neighbors, their devices & antennas on houses in my neighborhood! I want to move somewhere where my body can heal & be away from all the electro-smog that I'm convinced will ultimately kill me based on how badly I feel at times. I have been "an above average" active person & exercised "above average" my entire life starting in elementary school. This has been extremely difficult! I've spent over \$14k for modifications in my home (prior to 5G) only to have my 5G neighbors infringe on my living space that is difficult again. Prior home modifications don't stand a chance with 5G! I have to sleep in the living room since my bedroom is too close to my neighbors 5G bedrooms & devices. I'm a 24x7 care-giver and conservator to my low-functioning special needs sister who suffers alongside me. This is so unfair to her since she doesn't understand what's happening to her. In her behalf, I am submitting another comment. I am no longer an active member of society & the government has failed to protect me & my sister (entire population actually) against harmful radiation! For that I

am appalled. Thank you for taking this seriously & for working on a resolution for EMS-disabled people!

[Debbie Trublood, June 27, 2022](#)

As a person extremely sensitive to radiation from WiFi and cell towers I was driven from my home when a cell tower was built close to our property as resulting severe headaches and neurological complaints completely disabled me. I implore the FCC to take what EMS has done to a growing segment of the community seriously and offer protection from indiscriminate radiation.

[Lia Langston, June 1, 2022](#)

My partner has experienced headaches, brain fog, and drowsiness in the presence of high electromagnetic frequencies. We first realized this when his cell phone was on in a 2011 Prius. Problems were exacerbated when he bought a plug-in Prius which he was forced to trade in. We believe many drowsy drivers and car crashes may be created by use of EMF technologies without protection.

[Noalani Terry, June 1, 2022](#)

I have electromagnetic sensitivity, and have experienced the nightmare of being assaulted on a 24-7 basis by wireless radiation from utilities and neighbors I cannot control, in my own home. We must curb the reckless, unchecked agency of the telecom industry to place harmful cell towers and repeaters in close proximity to our living and sleeping spaces. I am not thriving and have continued health challenges due to the ever increasing exposure to constant radiation in my home, despite my best efforts to minimize my own contribution to the mess.

[Haw-Bin Chai, June 1, 2022](#)

I am one of the up to 30% of people who are sensitive to EMS and I request that you find a way to eliminate digital discrimination for the EMS disabled. We need to be able to participate in society and be safe in our own homes. Thank you.

[Jane Carlson, June 1, 2022](#)

I have been suffering from EHS for several years. I noticed heart palpitations, head pain, anxiety, loss of words, confusion on several occasions in 2018. They happened when I was using cell phones in the car. They happened when I was in proximity to a hotspot and wifi laptops. They happened when I tried using a Roku streaming player. They happened when I was upstairs from my tenant's "smart" meter, and I have paid PG&E to have that meter removed from my rental as it's been off my own home. I saw a cardiologist and other doctors who ruled out other serious problems. The symptoms continued and persist when I am in a building with wifi and with people using cell phones, even when I drive my kids to school and back. When I pass a cell tower, I feel a stabbing pain in my temple. I can only be outdoors and stay far away from people on their phones. We have a wired router and ethernet cords to our computers at home, and use a landline, no cell phone. This problem is huge, and I dread having to go to public places like the store, the library, and doctors' offices. It is a real problem learning how to live and cope. Only because I

am, sadly, meeting more and more people who have similar experiences do I feel like this has got to change.

[Martha Glaser, June 9, 2022](#)

I am an EMS person and I have family members who are as well. We have the right to be free of this ever present, non stop radiation.

[Constanza Abrams, June 1, 2022](#)

I was diagnosed with EM Hypersensitivity in 2016, while living in a home immediately adjacent to two cell phone towers. This acute EMF exposure has permanently altered my life, ability to function, work, travel, and everything else. I have a long-standing neurologic disease, which was never a major issue in my life before, but which was brought out of remission by living next to the cell towers. I became so ill, that my family was forced to move to a new home. In addition to my disease coming out of remission, I developed debilitating symptoms of aggravated nerve pain, migraines, heart arrhythmias, global inflammation, and several other health issues. I now have to severely limit my wireless EMF exposure for extended periods of time, in order to live a decent quality of life or be able to raise my children; and every time I don't do this, I become very ill again. Please don't deny this issue. I knew nothing about the harm from wireless radiation before my own condition developed, but now I KNOW wireless EMFs are damaging to all people--most especially those of us with body constitutions who are sensitive to these harmful radio waves. There are many of us who are literally becoming allergic to the modern world because of wireless EMFs everywhere, and it is terrifying to not have a place to go for safety where we can live normal, productive lives as people, parents, employees, etc. We deserve fair and equal treatment for our disabilities and our suffering. Thank you for your help with this most important and life-altering matter.

[Melia James, June 1, 2022](#)

As an EMF-sensitive individual and concerned RN I urge the FCC to ensure rigorous safety studies of 5G and other wireless technologies and protections for vulnerable people.

[Sheliah Roth, June 1, 2022](#)

4G and 5G has wreaked havoc on so many people I know, their children, animals, livestock and even plants/trees. Although I'm fortunate and am not constantly exposed to the 5G radiation, when I am exposed, I get incredibly sick. Please do not put any more of these towers up. They are a huge detriment to ALL living things.

[Abby Fredericksen, June 17, 2022](#)

Please look out for the citizens and stop the EMF signals in our neighborhoods! This is affecting our health. Headaches, dizziness and the feeling of unwell. We believe the future health of our children is at stake as well neurologically.

[P Stringer, Jun 17, 2022](#)

As is well known, EMF is the name given by the U.S. Access Board to the condition whereby individuals exposed to radio-frequency (RF) radiation from smartphones, WiFi,

cell towers, smart meters and other wireless devices experience adverse health effects or worsening of existing health conditions. I am someone who is within the population where it is estimated that up to 30% of the U.S. population – almost 99 million people – suffer at least mild symptoms after exposure to RF radiation, and for some, wireless exposure is the direct cause of, or at least a major contributing factor to, the impairment. This technology is making millions of Americans sick, and it is past time that it be recognized and addressed.

[Julie Ranieri, May 30, 2022](#)

I am troubled by the news that we are forced to endure 5g everywhere we go. I am bothered when I am around 5g and have had health problems as a result. This onslaught needs to stop and the putting up of cell towers everywhere must be stopped as well.

[Karen Jones, June 1, 2022](#)

Thank you for taking time [] to hear someone who had severe headaches, nausea, trouble going to and staying (a)sleep, loud ringing in my ears so I don't hear people talking, have trouble keeping focused due to the pain, severe rashes, memory loss so severe I have to write down what I'm doing so I can finish tasks. There's more suffering from radiation poisoning from emf/emr wifi, smart meters (our apartments put 4 smart meters on each building) in between our bedroom windows so we ALL are drowned in it.

[Jerri Magruder, June 23, 2022](#)

As someone with EMS, I have spent thousands of dollars working to protect myself as best I can in my home and when I go out into the community. I get heart palpitations and other symptoms when exposed to RF (wireless) technology and so try to minimize my exposure.

[Bibi Caspari, June 21, 2022](#)

EMS sensitivity is real. I know many people who have it and many more who don't consciously realize it yet. But more and more people are recognizing and making changes. It's time for the FCC to do the job it was designed to do and protect people. You can't imagine the changes you can make so let me help. Imagine leaving to a place without 5G and losing an inch to your waistline within 24 hours because 5G affects our digestive systems...Imagine sitting to watch TV and having heart palpitations...Imagine joining a Zoom call with video and having your brain on fire...these are just a few real life scenarios that could happen to you. Make a change before you are its next victim.

[Kelly Gunkel, June 17, 2022](#)

Electromagnetic sensitivity (EMS) is the name given by the U.S. Access Board to the condition whereby individuals exposed to radiofrequency (RF) radiation from smartphones, WiFi, cell towers, smart meters and other wireless devices experience adverse health effects or worsening of existing health conditions. Estimates indicate that up to 30% of the U.S. population – almost 99 million people – suffer at least mild symptoms after exposure to RF radiation, and for some, wireless exposure is the direct cause of, or at least a major contributing factor to, the impairment. This technology is

making millions of Americans sick, and it is past time that it be recognized and addressed.

[Eileen Gale, June 3, 2022](#)

I, too, am affected by wireless transmissions. My home is etherneted and I paid to have the wifi meters for electric and gas meters removed from my home. However, my part of town is filled with towers. I get headaches and feel intense levels of anxiety, teeth gnashing, etc. around modems on wifi. I take Excedrin everyday for the headaches, a mystery the Doc's can't account for. Please stop expanding the tower installations and ethernet, cable or hardwire the transmissions from now forward and plan to retrofit the existing towered areas!

[Allene Avey, June 1, 2022](#)

After a few hours in close proximity to these technologies I have experienced severe and worsening physical pain, so much so that it interferes with my ability to work. While having access to internet and cellular technologies is important, it is also important to have the option to opt out of having looming technological threats implanted in our communities. Thanks for your time.

[Charles Braddock, June 1, 2022](#)

After many years, I had to leave a big City of New York and move to CT due to severe health issues caused by RF that is all over the NYC. And a few years later, I've come to find out that once safe areas of CT without any notice got to install "death towers" aka cell towers. Making me sick every time I pass by one with no way to escape. I ask FCC to act on their sworn due in protecting We, the People.

[Vira M., June 1, 2022](#)

EMF sickness is real. I have had issues with the WiFi causing me heart arrhythmias. We should be allowed to say No to the cell towers built outside our home. This is causing real illness!

[Kimberly Crawford, June 1, 2022](#)

Wireless technology does cause real discomfort and physical harm / side effects to the electromagnetically sensitive, a legitimate subset of the population. Our family, except for one member, has this sensitivity. To this end, robust, safe FiOs/wired fast internet should be made available to all Americans, a very reasonable accommodation.

[M Lynn, June 1, 2022](#)

I have been suffering from emf sensitivities for 30 years. When the smart meters came out, I became anxious and had heart palpitations which caused me to go on beta blockers. This was 12 years ago. When WiFi came out, my condition got worse to where I now have daily headaches. We are talking migraines here along with dizziness and more heart palpitations. Cell towers cause me to be more sensitive to EMFs with the above symptoms increased, hard to eat without taking pepto-bismol because of the terribly nervous stomach. Please consider all the people who are now becoming sensitive to EMFs like me. We don't need these symptoms, nor do we need WiFi. Cell phones can

also cause the above problems as I cannot use one as it starts a headache immediately if I get too close to one.

[Joyce Soos, June 1, 2022](#)

I am filing on behalf of my low-functioning special needs sister. She also suffers from EMS. She has rapid heartbeat when we're in a buildings, stores, churches, gyms, movie theaters & even City Zoo's with WiFi, 5G and antennas everywhere! The biggest "clue" to me is she goes through behavioral changes. She is easily "agitated" & very moody when over-exposed to WiFi. She has been stripped of what little independence she had. I trained her to scan self checkout groceries but since implementation of 5G we both light up like firecrackers and can no longer go through self check outs anymore. The 2 worse ones are COSTCO and Whole Foods! This has also taken the joy away from my sister who took pride & felt like she was contributing with such a simple task as scanning groceries at check out. She LOVES Church and the gym and visits lots of friends & doesn't understand why we're not attending Church anymore (she's in tears when I tell her no to church), can't go to movies (we used to go 2-4x per month pre-pandemic) and just started going back to movies recently (but now we can't with 5G and entire audience with cell phones on & our symptoms start). My heart literally breaks for all the special needs & autistic communities whose "behavioral issues" are written off by doctors, teachers & possibly some parents who are naive to the fact the EMS exists! In many cases, these innocent souls are given destructive medications to "calm them down" when in-fact a majority of their symptoms are probably due to over-exposure of EMF's, WiFi, 5G, antennas in their homes, workplaces and schools and NOT THEIR FAULTS! I can and will testify to this fact as 24x7 care-given to my low functioning, low communication skills sister. I'm heartbroken to watch her struggle with her brain & quizzically look to me for answers as to what is happening to her physically since she can't communicate her pain to me! It's horrible to watch and endure! As most special needs parents can probably testify to, "behavioral issues" can be "them" trying to "process" (but can't in ways that we can) of the pain (both physical & emotional) that they're experiencing. (Side note: I believe wholeheartedly that Road Rage & all the unnecessary media in brand new cars contributes to Road Rage & behavioral issues in "normal people" that I witness on a daily basis as vehicles also are a source of overexposure to WiFi, EMF's!) Please help all these innocent souls & provide safe havens, education on EMS to entire nation, doctors, teachers, care-givers etc., but especially to special needs, disabled, autistic organizations. Some of these innocent souls have no voices to help them & are written off by people who should be (but are not) looking out for their needs and could care less! Thank you for addressing this urgent matter!

[Debbie Trublood \(sister/conservator\) on behalf of Lori Trublood](#)

CONCLUSION

The filed comments overwhelmingly indicate support for the two major points and specific suggestions made in the initial Comments by Advocates for the EMS Disabled. The Commission should embrace them as well.

The Commission should always prioritize “fiber to the premise” solutions and rely on mobile or fixed wireless only when fully wired is technically or economically infeasible or the main purpose is mobility. Those who are RF-sensitive and especially those with EMS disabilities must be allowed equal access to broadband in a form that does not threaten or worsen their health and well-being. They should be able to obtain fiber to the premises as a matter of right. There must be an allowance for RF-free “safe zones” in public spaces and buildings to ensure inclusion in public life. Those who cannot be around RF must have the ability, as a matter of right, to obtain wired (fiber-based) broadband.

Respectfully Submitted,

/s/
W. Scott McCollough
McCollough Law Firm, P.C.
2290 Gatlin Creek Rd.
Dripping Springs, TX 78620
512.633.3498
wsmc@dotlaw.biz

Counsel for Children’s Health Defense.

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”:

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; Kent Chamberlin, PhD, Former member of the NH Commission to Study The Environmental and Health Effects of Evolving 5G Technology; Californians for Safe Technology; Julie Levine, 5G Free California; Coloradans for Safe Technology; Larry Ortega, Community Union, Inc.; Paska Nayden, Connecticut for Responsible Technology; Ms. Eva Bortnick; Howard Goodman, Esq.; Safe Technology Minnesota; 5G Free Rhode Island; ; Napa Neighborhood For Safe Technology; Massachusetts for Safe Technology; New Hampshire for Safe Technology; New Yorkers 4 Wired Tech; Pennsylvanians for Safe Technology; Stephen R. Dahl, Director, Rhode Islanders for Safe Technology; Safe Tech International; Sidnee Cox, Windsor, CA; Safe Tech for Santa Rosa; Virginians for Safe Technology; Mark Wahl, Director, Citizen League Encouraging Awareness of Radiation of Whidbey Island, WA; Lendri Purcell, President, FACTS (Families Advocating for Chemical and Toxics Safety); Ms. Linda Dance, Engineer; Lex Kisteneff, CEO & Founder, The South Carolina Coalition for Wireless Safety Standards; mocoSafeG.org in Montgomery County, MD; Kirstin Beatty, Director, Last Tree

Laws Massachusetts, Holyoke, MA; Josh Hart, Director, StopSmartMeters.org; Pittsfield Cell Tower Injured and Concerned Citizens; Liberty Goodwin, Director, Toxics Information Project (TIP); Richard Thom; Tracey Roizman, DC, Asheville, NC; Hank Allen, Idahoans for Safe Technology; Margaret Phillips, MA, MPH; Flo Mitchell Kosik; Grace Shen, Physical Therapist; Shawn Hutchens, CEO of Green Fields Trading Co Inc., Lake Station, Indiana; Friends of Merrymeeting Bay (FOMB); Maine Coalition to Stop Smart Meters; William Now, Carmichael, CA; Barbara Payne, President, Electromagnetic Pollution Illnesses Canada Foundation (EPIC); Keldwyn Teves, Artist & Writer, Fletcher, NC; Janet FitzGerald, Sharon MA; Patricia Burke, EHS Disabled, Journalist/Advocate, Millis, Massachusetts; Monique Maisenhalter, SWORT Board Member, SW Ohio for Responsible Technology; Nancy Perlman, Glen Ellyn, Illinois; Diane Douglas, Licensed Occupational Therapist, Fairview, NC; Sharon Behn, Arden, NC; Tais Howard LAC, MAOM, Dipl. O.M. (NCCAOM); Natalie Sadler, MD, Holistic Psychiatry; Nancy Van Dover BA, DVM, OMD, Dipl Acup; Cynthia Franklin, Director, Consumers for Safe Cell Phones; Andrea Mercier, Mother; Cheriell Jensen; Mark Graham, Keep Cell Towers Away, Elk Grove, CA; Michael Muadin, President of AMRA, Alliance for Microwave Radiation Accountability, Inc., East Chatham, New York; Malibu For Safe Tech; Shannon Shine, Rocky Mountains for Safe Technology; Ann K. Friday, Relocate the Cell Tower Group, Prescott, AZ; Stephanie Thomas, Phoebe Ann Thomas Sorgen (Co-Founder), Soula Culver, Sarah Aminoff, Meaveen O'Conner, Sandy Nixon, Connie Anderson, Members, WiRED, Berkeley, CA; Luanne Moore, Boynton Beach, FL; Glen Ellyn VHP, Glen Ellyn, IL; Debra Green, Safe Tech Hawaii, Kihei, Hawaii; Shane Riley, 5G Free Oregon, Portland, OR; Keep Oregon for Safer Technology; Ellen Marks, California Brain Tumor Association, Indian Wells, CA; Frederick P. Sinclair, Jr., Alfred, NY; Cynthia Rahav, Berkeley, CA; Susan Jennings, SW Pennsylvania for Safe Technology, Mount Pleasant, PA; Lisa C. Smith, Safe Tech Tucson, Tucson, AZ; Linda Smith, EMF Wellness Tucson, Tucson, AZ; Scott Tips, President & General Counsel, National Health Federation.