

Global Union Against Radiation Deployment from Space

www.stopglobalwifi.org



December 17, 2015

E-Filed

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C., 20554

Re: Informal Objection Under Section 5.95 to Application of Google, Inc., Application for Experimental License, File No. 0747-EX-PL-2015

Dear Ms. Dortch,

We are writing in opposition to the request by Google, Inc. for an experimental permit to blanket 88.6 - 99.6% of the land area of the continental U.S. with radiofrequency (RF) radiation. Due to the documented harmful effects of RF radiation exposure on human health and the environment, along with the fact this project violates the U.N. Convention on the Rights of Persons with Disabilities, several sections of the U.N. Convention on the Rights of the Child, and International Human Rights Law in the Universal Declaration of Human Rights, approval of this permit should be denied. Question 9 of the Google, Inc. FCC application asks if there will be an Environmental Impact from the project and the applicant has answered in the negative. We emphatically disagree.

GUARDS is an international coalition against global WiFi from space, a technology that endangers all life on Earth. The insurance industry currently recognizes the immense risks of insuring companies against radiofrequency injury claims, and coverage from the major firms like Lloyds and Swiss Re is no longer available. With the lack of adequate insurance, and RF radiation (including the microwave radiation utilized by wireless technology) currently classified a “possible human carcinogen” by the World Health Organization, there are legal implications related to irradiating entire countries and their citizens without their informed consent. Strong correlations exist between RF radiation exposure from wireless technologies, increasing rates of Radiofrequency Sickness and many cancers. In several countries (Italy, France, Spain Australia), plaintiffs have gone beyond correlation to successfully prove causation, and damages have been awarded by the courts. It is also important to highlight the potential for satellites/upper atmosphere antennas and their communications to be hijacked, posing serious security risks.

RF Radiation - Environmentally Harmful and a Public Health Hazard

U.S. Department of Interior States: Current Radiation Standards Inapplicable

On February 7, 2014, the U.S. Department of Interior (DOI) stated, “*the electromagnetic radiation standards used by the Federal Communications Commission (FCC) continue to be based on thermal heating, a criterion now nearly 30 years out of date and inapplicable today,*” in reference to the current limits governing radiation utilized by WiFi. The DOI letter discusses a number of studies in which birds appear harmed by low-level RF radiation associated with cell towers and other wireless technologies, as are planned by Google, Inc.

FCC Investigation of Current Exposure Limits Underway

With the FCC finally beginning re-evaluation of current irrelevant and obsolete non-ionizing RF exposure guidelines, it seems imprudent to approve technology applications encouraging global proliferation of RF microwave radiation.

In the Inquiry the FCC requests comment to determine whether its RF exposure limits and policies need to be reassessed. Since consideration of the limits themselves is explicitly outside of the scope of ET Docket No. 03-137, the FCC opens a new docket, ET Docket No. 13-84, with the Inquiry to consider these limits in light of more recent developments. The Inquiry is intended to open discussion on both the currency of our RF exposure limits and possible policy approaches regarding RF exposure.

<https://www.fcc.gov/encyclopedia/radio-frequency-safety>

International Recognition of Need for More Conservative RF Safety Limits

Countries around the world are increasingly recognizing the risks of RF radiation and advising action to protect the public http://www.cellphonetaskforce.org/?page_id=128. Even the U.S., as cited above, is in the process of reviewing RF exposure guidelines. Countries such as China, Russia, Italy and Switzerland already have wireless radiation safety limits 100 times lower than the United States.

Canada: Previous Safety Code 6 Inadequate

In June 2015, Canadian Parliament's Standing Committee on Health (HESA) issued a report with 12 unanimous recommendations for increased caution, investigations, reporting and data gathering with regard to RF/EMF and wireless devices. Canada's Safety Code 6 provided guidelines for RF exposure virtually identical to 1996 FCC guidelines until recently (March 2015) when Canada reduced its maximum permissible exposure limits by nearly 50%. *"The [HESA] Committee agrees that the potential risks of exposure to RF fields are a serious public health issue that needs to be brought to the attention of Canadians so that they have the knowledge to use wireless devices responsibly and are able to make decisions about the use of wireless devices in a manner that protects their health and the health of their families."* The Standing Committee report shares themes including cancer, illness, fertility, autism, public awareness, school environments, and medical responsibilities. It discusses studies demonstrating adverse effects at levels below Health Canada's guidelines.

http://www.parl.gc.ca/Content/HOC/Committee/412/HESA/Reports/RP8041315/412_HESA_Rpt13_PDF/412_HESA_Rpt13-e.pdf

World Health Organization (WHO) Scientists Warn of Increased Risk to Public Health

We are also concerned spatial and temporal increases in microwave radiation caused by this and other planned airborne Wi-Fi deployments will be harmful to public health. Wireless technology operates using pulsed microwave radiation: *"The human body,"* says Dr. G.J. Hyland (International Institute of Biophysics, Neuss-Holzheim, Germany), *"is an electrochemical instrument of exquisite sensitivity,"* noting that, *"like a radio, it can be interfered with by incoming radiation."* If a signal is strong enough to operate a device, it is strong enough to disturb every cell in the human body.

In 2011, the International Agency for Research on Cancer (IARC), a committee of the WHO, classified RF radiation as a Group 2B carcinogen in the same category as lead and DDT. Alarming, several scientists who were members of the IARC working group involved with this classification now conclude the risks are much greater than originally thought. For example, Dr. Dariusz Leszczynski warns that RF-EMF should be classified as a Group 2A carcinogen, and Dr. Lennart Hardell reports that several studies indicate a Group 1 classification is justified, placing RF-EMF in the same category as tobacco, asbestos, and benzene.

Dr. Dariusz Leszczynski MSc, DSc, PhD

<https://betweenrockandhardplace.wordpress.com/2014/08/14/carcinogenicity-of-cell-phone-radiation-2b-or-not-2b/>

"In conclusion, I consider that currently the scientific evidence is sufficient to classify cell phone radiation as a probable human carcinogen – 2A category in IARC scale. Time will show whether 'the probable' will change into 'the certain'. However, it will take tens of years before issue is really resolved.

In the mean time we should implement the Precautionary Principle. There is a serious reason for doing so.”

Dr. Lennart Hardell MD, PhD <http://www.ncbi.nlm.nih.gov/pubmed/24192496>

“Based on the Hill criteria, glioma and acoustic neuroma should be considered to be caused by RF-EMF emissions from wireless phones and regarded as carcinogenic to humans, classifying it as group 1 according to the IARC classification. Current guidelines for exposure need to be urgently revised.”

Statements like these support our contention that no new large-scale irradiation of the public, like Google’s proposed project, should be allowed prior to establishment of biologically protective RF safety limits. In fact, permitting such a project without first updating RF safety limits to be biologically protective of the whole population for the exposures they are likely to experience daily would be in direct violation of the entire Nuremberg Code of Ethics (<http://www.hhs.gov/ohrp/archive/nurcode.html>).

International Scientists Warn of High Risk and Multigenerational Effects

The 1,500-page BioInitiative Report on RF/MW health effects was published in 2012. The authors are 29 scientists from 10 countries. They reviewed thousands of studies showing interference with chemical processes in the body, implicating RF/MW in a whole spectrum of alarming effects including genetic damage, cancer, immune dysfunction, neurological injury, and infertility www.bioinitiative.org.

More recently, in 2015, from 40 countries over 200 scientists with over 2,000 peer-reviewed journal articles to their collective credit in the field of biological impacts from RF/EMF appealed to the U.N. and the WHO for greater precautions with regard to exposures from wireless technologies. This is the latest in many such alerts to the health effects of RF/EMF exposure <https://www.emfscientist.org/>.

A paper by Microwski, *Electromagnetic Fields: High Level Microwave Technology Concerns* <http://c4st.org/images/documents/wifi-in-schools/doclinks/RFCorrosion,etc-1.pdf> references a study by, Magras and Xenos 1997, *RF Radiation-induced Changes in the Prenatal Development of Mice* <http://www.ncbi.nlm.nih.gov/pubmed/9261543>. The study indicates at environmental wireless exposure levels (0.168 $\mu\text{W}/\text{cm}^2$ to 1.053 $\mu\text{W}/\text{cm}^2$) lower than those now commonplace outdoors in Metro Toronto, Hamilton, Mississauga, mice become infertile between third and fifth generations.

The continuous exposure to microwave radiation proposed in this Google, Inc. project along with that emitted from a myriad of wireless devices may have implications far greater than we could imagine with nothing less than the continuation of the human race at stake.

Violation of International Human Rights

This Google, Inc. proposal violates Article 3 of The UN Declaration of Human Rights, ratified by the General Assembly in 1948, which states “*everyone has the right to life, liberty and security of person.*” Data exist showing RF radiation can cause serious biological effects at levels far below the existing FCC RF limits (www.bioinitiative.org). These include damage to DNA which can lead to an increased risk for cancer and deleterious genetic mutations passed on to future generations. Decreases in sperm count and quality and increases in miscarriage and infertility have also been demonstrated in response to exposure to RF radiation. Although much of the recent research focuses on frequencies in WiFi and cellphone ranges, prior research is available showing serious biological effects in the mm wavelengths that Google, Inc. proposes to use.

Observed higher resonance frequencies of a living cell coincide with frequencies of radiation of communications satellites. The power densities and duration of irradiation created by these satellites will significantly exceed (by ten or more orders of magnitude—such irradiation is possible over the course of a whole lifetime) the energetic doses inducing changes in living cells.

Negative consequences of this may be changes in cell structures and physiological processes, genetic changes, and alteration of psychophysiological conditions and behavior; (http://www.salzburg.gv.at/2001_kositsky_et_al._-_ussr_review-2.pdf).

More recent scientific publications look specifically at causality, such as M.L. Pall in “*Microwave Frequency Electromagnetic Fields (EMFs) Produce Widespread Neuropsychiatric Effects Including Depression*” (J Chem Neuroanat. 2015 Aug 20; <http://www.sciencedirect.com/science/article/pii/S0891061815000599>). It discusses the causal relationship between exposure to radiation from wireless technology and neuropsychiatric effects. Mechanisms of action are also discussed.

Yakymenko et al. discuss the fact that RF radiation is documented in numerous studies to cause oxidative damage and discuss mechanisms (*Low Intensity Radiofrequency Radiation: A New Oxidant for Living Cells*; Oxid Antioxid Med Sci 2014; 3(1):1-3; (https://www.researchgate.net/publication/269995792_Low_intensity_radiofrequency_radiation_a_new_oxidant_for_living_cells).

A more recent study by Yakymenko, et al., 2015, *Oxidative Mechanisms of Biological Activity of Low-intensity Radiofrequency Radiation* finds in 93 of 100 reviewed studies a wide pathogenic potential of the induced Reactive Oxygen Species (ROS) and their involvement in cell signaling pathways explains a range of biological/health effects of low intensity RF radiation, which include both cancer and non-cancer pathologies. Their concluding analysis demonstrates low-intensity RF radiation is an impressive oxidative agent for living cells with a high pathogenic potential and that the oxidative stress induced by RF radiation exposure should be recognized as one of the primary mechanisms of the biological activity of this kind of radiation. (<http://www.mainecoalitionstoptosmartmeters.org/wp-content/uploads/2015/07/Yakymenko-et-al-2015.pdf>)

Lerchl, et. al. in 2015 performed a replication experiment of work done by Tilmann, et. al. in 2010 but increased the N. Their work: *Tumor Promotion by Exposure to Radiofrequency Electromagnetic Fields Below Exposure Limits for Humans* found tumors in mice promoted by exposures to levels of RF at below government exposure limits for the use of mobile phones. Numbers of tumors of the lungs and livers in exposed animals were significantly higher than in sham-exposed controls. In addition, lymphomas were also found to be significantly elevated by exposure; (<http://www.ncbi.nlm.nih.gov/pubmed/25749340>).

Non-ionizing radiation does act through oxidative mechanisms on cells. Oxidative mechanisms=formation of free radicals. Free radicals may cause cancer. Therefore non-ionizing radiation may cause cancer.

Replicated double-blind studies show that a cordless phone base station operating at WiFi frequencies can cause cardiac arrhythmias in susceptible individuals (<http://www.magdahavas.com/wordpress/wp-content/uploads/2012/01/Havas-HRV-Ramazzini.pdf> and www.ncbi.nlm.nih.gov/pubmed/23675629#).

Blanketing the continent with radiation that can have such a serious, even deadly effect, is unethical. A study in rabbits found that not only did WiFi change heart function parameters, but it dramatically changed the cardiac effects of both dopamine and epinephrine: Saili L, et al. *Effects of Acute Exposure to WIFI Signals (2.45 GHz) on Heart Variability and Blood Pressure in Albinos Rabbit*. Environmental Toxicology and Pharmacology 40 (2015) 600–605; (<http://www.sciencedirect.com/science/article/pii/S1382668915300594>). Therefore, ubiquitous RF radiation may not only cause cardiac emergencies, but prevent treatments from working and cause deaths. The threat to cardiac health is also supported by epidemiological studies showing increased death from cardiac events and heart disease - Criticism of the Health Assessment in the ICNRP Guidelines for Radiofrequency and Microwave Radiation (100 kHz - 300 GHz). (www.electricalpollution.com/documents/Cherry2000EMR_ICNIRP_critique_09-02.pdf)

Forced exposure to an agent that has the effects discussed above and enumerated in the resources listed above would have to be considered as violations of the Nuremberg Code of Ethics (<http://www.hhs.gov/ohrp/archive/nurcode.html>). Google, Inc.’s project would force such an exposure.

Furthermore, this proposal violates Article 25 of International Human Rights (1), which states, “*Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food,*

clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.”

Exposure to an agent that disrupts hormones, sleep, cardiac, and neurological function, and has forced numerous people from their homes and into poverty is an obvious violation of numerous fundamental rights which are to be universally protected according to The U.N. Declaration of Human Rights.

Violation of U.N. Convention on the Rights of the Child

Under the Convention on the Rights of the Child, states/countries are responsible for acting in their children’s best interest. In this case, that would mean denying Google, Inc.’s request for an experimental permit to blanket the country in RF radiation.

In a letter to Congress, the American Academy of Pediatrics stated:

“Children are disproportionately affected by environmental exposures, including cell phone radiation. The differences in bone density and the amount of fluid in a child’s brain compared to an adult’s brain could allow children to absorb greater quantities of RF energy deeper into their brains than adults.”
<http://apps.fcc.gov/ecfs/document/view?id=7520941318>

No child should be forced to be exposed to RF radiation and therefore forced to incur an increased risk of cancer, functional impairment leading to ill health or cognitive impairment, or genetic damage in *their* children.

Any of these outcomes, which research supports as likely, violate children’s rights. Electromagnetic Radiation, Health and Children 2014 by Dr. Erica Mallery-Blythe (<https://www.youtube.com/watch?v=sNFdZVeXw7M>) is a must-watch presentation about the hazard that RF radiation emitted by wireless technology poses to children.

Dr. Mallery-Blythe’s presentation references several U.N. Conventions on the Rights of the Child that would be violated by this project including:

Article 3 (best interests of a child) The best interests of a child must be a top priority in all decisions and actions that affect children.

Article 23 (children with a disability) A child with a disability has the right to live a full and decent life with dignity, and, as far as possible, independence and to play an active part in the community. Governments must do all that they can to support disabled children and their families.

Article 24 (health and services) Every child has the right to the best possible health. Governments must provide good quality health care, clean water, nutritious food and a clean environment and education on health and well-being so that children can stay healthy

Article 28 (right to education) Every child has a right to education.

The United Federation of Teachers, representing 200 000 members, currently provides information on their website advising members to reduce to RF radiation, with resources for pregnant mothers in order to protect their unborn children noting that *“Wireless radiation is emitted by the myriad of wireless devices we encounter every day. It was once thought to be relatively harmless. However, we now know that wireless radiation can cause non-thermal biological effects as well, including damage to cells and DNA, even at the lowest levels.”* (<http://www.uft.org/our-rights/wireless-radiation>).

A Brief from the Canadian Teachers’ Federation *“The Use of WiFi in Schools (2014), warns that “Teachers and school communities have not been informed regarding the implementation of WiFi and any inherent potential hazards”* and go on to share that *“Teachers are rightly concerned for their personal safety and the safety of the children in their care”* (<http://www.ctf-fce.ca/Research-Library/wifi-final-2014-ENG.pdf>).

Violation of U.N. Convention on the Rights of Persons with Disabilities

Increasing numbers of countries, such as Sweden and France, (as do the Canadian Human Rights Commission and European Parliament) recognize Electrohypersensitivity (EHS) as an environmentally induced functional impairment or disability triggered by exposure to electromagnetic fields (including RF). Continental or global WiFi would contravene: Article 1 “*promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity*”; Article 3 “*Full and effective participation and inclusion in society*”; Article 15(2) states: “*Parties shall take all effective legislative, administrative, judicial or other measures to prevent persons with disabilities, on an equal basis with others, from being subjected to torture or cruel, inhuman or degrading treatment or punishment*”; and violate the intent of many more Articles, since the planet would be blanketed with microwave radiation that those suffering EHS could not escape.

The European Economic and Social Committee (EESC) is an E.U. advisory body comprising representatives of workers’ and employers’ organizations and other interest groups. It issues opinions on E.U. issues to the European Commission, the Council of the E.U., and the European Parliament, thus acting as a bridge between the E.U.’s decision-making institutions and E.U. citizens. In February 2015, a formal letter of notice was sent to the EESC by the Radiation Research Trust (based in U.K.) and approximately 90 other organizations from around the world in support of millions of people, estimated to be between 22,000,000 and 37,000,000 throughout Europe currently suffering EHS due to exposure to the proliferation of RF emissions and emitters (i.e., mobile phones, DECT cordless phones, cordless baby monitors, phone masts, WiFi, smart meters, the smart grid, et al.) (http://www.radiationresearch.org/images/rrt_articles/EM-Radiation-Research-Trust-Letter-of-Notice-Served-on-Mr-Richard-Adams.pdf).

Some researchers estimate approximately 3% of the population has severe symptoms of EHS and another 35% of the population has moderate symptoms such as impaired immune system and chronic illness (Havas, 2007). Hallberg and Oberfeld published in *Electromagnetic Biology and Medicine* (2006) historical EHS data and project if past trends continue that 50% of the total population is expected to suffer due to EHS by year 2017 (http://www.next-up.org/pdf/EHS2006_HallbergOberfeld.pdf).

Canadians For Safe Technology (C4ST) points out, “*EHS is accepted as a functional impairment in Sweden and the Canadian Human Rights Commission recognizes it as an environmental sensitivity and classifies it as a disability.*” With some countries already recognizing the medical needs of those affected by EHS and the potential for millions of people around the world to suffer EHS from increased exposure to radiation from wireless technology, further proliferation of wireless technology on a wide scale is unacceptable.

Jenny Fry (age 15) hanged herself when her school refused to understand that being in classrooms with WiFi caused her to experience serious physical discomfort and harassed and bullied her by requiring her to serve detentions for leaving classes due to WiFi induced symptoms in rooms where she experienced intense functional impairment (<http://www.independent.co.uk/news/uk/home-news/school-girl-found-hanged-after-suffering-from-allergy-to-wifi-a6755401.html>).

International Human Rights, Article 26 states that “(1) *Everyone has the right to education.*” People with disabilities and functional impairments like Jenny’s have a right to go to school in an environment free from RF radiation, in a school that will not make them sick. Her rights, like the rights of all those experiencing this type of functional impairment, should be protected under the Universal Declaration of Human Rights.

Many other persons experience similar functional impairment when exposed to RF radiation: “Parents Sue School, Claim Wi-Fi Makes Son Sick” (<https://www.yahoo.com/parenting/parents-sue-school-claim-wi-fi-makes-son-sick-127644771007.html>), “WiFi in Schools: How Safe” (<http://www.publicnewsservice.org/2014-09-22/health-issues/wifi-in-schools-how-safe/a41810-1>) and “Maryland woman suffers acute radiation exposure from a bank of smart meters” (<https://www.youtube.com/watch?v=x-yt-cl=84503534&x-yt-ts=1421914688&v=F9QZuWPw6Y0>).

The EUROPAEM EMF Guideline 2015 for the prevention, diagnosis and treatment of EMF-related health problems and illnesses has found: "The health problems may range in severity from benign, temporary symptoms, such as slight headaches or paresthesia around the ear, e.g. when using a cell phone, or flu-like symptoms after maybe some hours of whole body EMF exposure, to severe, debilitating symptoms that drastically impair physical and mental health. It has to be stressed that, depending on the individual state of susceptibility, EHS symptoms often occur only occasionally, but over time they may increase in frequency and severity. On the other hand, if a detrimental EMF exposure is sufficiently reduced, the body has a chance to recover and EHS symptoms will be reduced or will vanish." (<http://www.degruyter.com/view/j/reveh.2015.30.issue-4/reveh-2015-0033/reveh-2015-0033.xml>)

Environmental Impacts

A parade of studies continue to be published implicating wireless technology in the die-off of forests, the demise of frogs, bats, and honey bees, the threatened extinction of the house sparrow, and damage to the DNA of the human species. It is vital to the continuation of life that large parts of Earth are spared the incessant radiation that accompanies wireless technologies.

- "The Report on Possible Impacts of Communication Towers on Wildlife Including Birds and Bees" commissioned on 30th August 2010 by the Ministry of Environment and Forest, Government of India http://www.moef.nic.in/downloads/public-information/final_mobile_towers_report.pdf
- "Impacts of radio-frequency electromagnetic field (RF-EMF) from cell phone towers and wireless devices on biosystem and ecosystem – a review," http://www.biolmedonline.com/Articles/Vol4_4_2012/Vol4_4_202-216_BM-8.pdf
- Balmori, A. "Electromagnetic pollution from phone masts. Effects on wildlife," *Pathophysiology* (2009), doi:10.1016/j.pathophys.2009.01.007 <http://www.ncbi.nlm.nih.gov/pubmed/19264463>
- October 31, 2014 presentation to the Manitoba Entomological Society, reviewing 91 studies on the effects of RF/MW radiation on honey bees, insects, birds, etc: https://groups.google.com/forum/#!topic/mobilfunk_newsletter/0RUPGTI4qQY

United Nations Rio Declaration on Environment and Development

The Precautionary Principle as drawn up in Rio in 1992 - the Rio Declaration: <http://www.gdrc.org/u-gov/precaution-7.html>

In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.

Principle 15 codified for the first time at the global level the precautionary approach, which indicates that lack of scientific certainty is no reason to postpone action to avoid potentially serious or irreversible harm to the environment. Central to principle 15 is the element of anticipation, reflecting a requirement that effective environmental measures need to be based upon actions which take a long-term approach and which might anticipate changes on the basis of scientific knowledge.

From the U.N. General Assembly: Resolution adopted by the General Assembly July 2012 66/288 The Future We Want

We recognize the importance of strengthening international, regional and national capacities in research and technology assessment, especially in view of the rapid development and possible deployment of new technologies that may also have unintended negative impacts, in particular on biodiversity and health, or other unforeseen consequences.

http://www.un.org/ga/search/view_doc.asp?symbol=A/RES/66/288&Lang=E

An ETC Group Press Release [UN Moves Towards an Early Listening System](#) shares: “*The decision paves the way for a badly needed early warning system on the impacts of new technologies*” and explains:

ETC Group proposed the creation of a technology assessment capacity in the UN in the lead up to the 2012 Rio Summit. At that time, the proposal was backed by the G-77 and China and a few OECD states such as Sweden and Norway. The Summit concluded with a surprisingly strong call for technology assessment from local to global levels warning that new technologies could pose significant health and environmental risks. <http://www.etcgroup.org/content/un-moves-towards-technology-early-listening-system>

And from *The Lancet*:

Planetary health is a new science that is only beginning to draw the coordinates of its interests and concerns. It demands new coalitions and partnerships across many different disciplines to meet the pervasive knowledge failures identified by this Commission. It demands new attention to governance and implementation. And, perhaps most of all, it demands more creative imagination among scientists and practitioners working in health—redefining the meaning of human progress, rethinking the possibilities for human cooperation, and revitalising the prospects for the health of human civilizations. (par 7)

and

Second, planetary health concerns the natural systems within which our species exists—for example, the health and diversity of the biosphere. Human beings live within a safe operating space of planetary existence. If the boundaries of that space are breached, the conditions for our survival will be diminished." Currently, natural systems are being degraded to an extent unprecedented in history, with known and as yet unknown and unquantified effects on human health. (par 2)
[http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736\(15\)61038-8.pdf](http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736(15)61038-8.pdf)

Insurance Companies Warn of Large Losses Due To Electromagnetic Fields

We also note that insurance in the event of injury due to RF/MW radiation is not likely to be adequate – see pages 1 and 2 in the document at the following link:
<http://www.gao.gov/assets/600/591391.pdf>

Stop Smart Meters UK shares that: “*Insurance Firm, Swiss Re, Warns of Large Losses from “Unforeseen Consequences” of Wireless Technologies*: <http://stopsmartmeters.org.uk/insurance-firm-swiss-re-warns-of-large-losses-from-unforeseen-health-claims-due-to-wireless-technologies/> (Source: swissre.com)

Specialists from the Emerging Risks team at leading global reinsurance firm, Swiss Re, are warning the insurance industry that “unforeseen consequences of electromagnetic fields” could lead to a raft of claims and significant product liability losses in the next 10 years.

In its Swiss Re SONAR Emerging Risks report, 2013, which covers risks that could “*impact the insurance industry in the future*”, the company categorizes the impact of health claims related to electromagnetic fields (EMFs) as ‘high’. It acknowledges recent reports of courts’ ruling in favor of claimants who have experienced health damage from mobile phones, and also says that anxiety over risks related to EMFs is “on the rise”.

The document states that whilst the majority of the topics covered in its pages were of “medium impact”, health issues associated with EMFs sit in the highest impact category. Other topics discussed include the dangers of cyber attacks, power blackouts, workplace safety and Big Data all of which are exacerbated and/or added to with the ill-conceived “smart” metering programs.

Lloyd’s listed hazards from new technologies including EMF in its 2011 Top 50 Risks. Coverage for RF/EMF injuries typically related to cell phones and cell towers is now categorically excluded. In their 2013 Risk Report,

new technology risks have increased slightly in risk rank. It is worth noting these risks are classified under Environmental (i.e., does the applicant expect to have an adverse environmental impact?) as distinct from the Lloyd's appraisal of cybersecurity risks (also applicable to Google, Inc. and rated much higher risk). <http://www.lloyds.com/~media/Files/News%20and%20Insight/Risk%20Insight/Risk%20Index%202013/Report/Lloyds%20Risk%20Index%202013report100713.pdf>

GUARDS asserts the Google, Inc. project would intensify these concerns on a continental and global scale.

Interference with Airplane Instrumentation and Hazard to Flight Crew and Passengers

The proposed Google, Inc. project locates transmitters at altitude 62,000 feet. Commercial airspace extends to 60,000 feet. The Google transmitters would broadcast at up to 300 kW immediately overhead all aircraft, whereas a cell tower would be only 1 to 4 kW. It seems likely that these very powerful transmitters pose a risk to commercial aircraft.

Wireless signals are already causing interference with aircraft systems. An FAA Airworthiness Directive (or AD) points out that WiFi on board aircraft is blanking out display units in the cockpit (<http://www.b737.org.uk/ad-2014-20-06.pdf>, <https://s3.amazonaws.com/public-inspection.federalregister.gov/2014-23231.pdf>). The FAA has given a five-year time limit for airlines to replace all these display units. However, even new units may not be able to withstand the strength of signal that the Google, Inc. project would expose them to. There is reason for concern because the same AD mentions, "The intent of this AD is to eliminate this known susceptibility of the phase 3 DUs to RF transmissions, including those from sources outside the airplane. This susceptibility is not limited to WiFi transmissions, but has been verified to exist in a range of the RF spectrum used by mobile satellite communications, cell phones, air surveillance and weather radar, and other systems."

Furthermore, the signal strength will certainly be strong enough to cause biological functional impairment of the flight crew and the passengers. Since biological functional impairment induced by exposure to RF radiation from wireless technology can range from minor to serious, even including death, it is of paramount importance for the safety of air travel that the permit be denied.

NEPA and Environmental Review

This is major Federal action significantly affecting the quality of human environment; as such, a NEPA review would be triggered. The potential environmental and human health hazards from Google, Inc.'s project necessitate comprehensive NEPA review [*Envtl. Def. Fund v. Tenn. Valley Auth.*, 468 F.2d 1164, 1174 (6th Cir. 1972)] and, specifically, a formal Environmental Impact Statement (EIS). The EIS should include a full review of environmental effects, as well as human health and safety. The FCC has an obligation to evaluate whether "services or capabilities are essential to public health, safety, or in the public interest" (H.R. Report No. 104-204, p. 94), so must protect the public from possible harm caused by radiofrequency radiation.

The FCC is not entitled to essentially disregard comments that do not provide global cost-benefit analysis (*Scenic Hudson v. Federal Power Commission*). The Commission has an affirmative duty to inquire into and consider all relevant facts. The FCC must use government resources to perform the relevant analysis. The FCC should request the EPA use its National Risk Management Research Laboratory resources and experts to conduct all cost analyses necessary.

This proposal also triggers the need for a Memoranda of Understanding (MOU) with U.S. Fish and Wildlife Service under Executive Order 13186 concerning effects on migratory birds. Legal issues and liability aside, the cumulative and additive environmental and health risks of microwave radiation (MWR) saturation from the upper atmosphere are extremely high. Approval of such technology may never be appropriate given the high risks to societies but certainly at present, given the current state of our knowledge, permit approval would be premature.

Conclusion

Increased health care costs, increased disability and associated costs, decreased productivity from missed or substandard work performance, lost or compromised ecological services and agricultural harm from RF-EMF exposure could cost societies billions of dollars. Not only is RF-EMF proliferation bad for health and the environment directly, this damage has a major economic cost as well.

Please consider our comments as reasons a permit for Google, Inc.'s proposed project should be denied. In brief, those reasons include insurance industry recognition of serious risk to health, cyber and national security, demonstrated detrimental biological effects at levels far below existing inadequate RF safety limits, radiofrequency radiation currently classified "*possible human carcinogen*" by the World Health Organization, legal implications related to irradiating the entire continent without informed consent, personal security risks, and resultant violations of U.N. Conventions and Universal Declaration of Human Rights.

Because the potential global effects of this and similar proposals from Facebook, SpaceX and others are devastating, any consideration must proceed only with maximum levels of due diligence, including full public access to application documents and all project specifications—not heavily redacted secretive applications like Google, Inc.'s. The potential dangers to society outweigh any proprietary rights of Google, Inc. The public should have a chance to evaluate and comment on the full application.

Global wireless access, with all its serious safety problems, is an unacceptable hazard. Widely available fast internet access is a goal that can be safely attained using various forms of cabled connectivity.

GUARDS respectfully requests Google, Inc.'s application be denied.

Sincerely,



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GUARDS is an international coalition against global WiFi from space, a complex technology of radiation and toxic chemicals endangering all life on Earth.