

ORIGINAL

03-23-12 DOCKET NO. E-00000C-11-0328
AZ CORPORATION COMMISSION - METER GUIDELINE WORK
APS CONSUMER COMMENTS - NANCY BAER



0000135152

BACKGROUND: As someone with a compromised immune system, coronary and atherosclerosis diseases, and thyroid cancer survivor from excess radiation to my ears as a child, I have been following the "smart meter" hearings and conducting my own research since the Special Meeting was held by the Arizona Corporation Commission (AZCC) on 09/08/11.

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AZ CORP COMMISSION
DOCKET CONTROL

After reviewing your staff's "list of proposed guidelines," I am shocked, outraged AND offended that there is not one reference to the biological and health consequences associated with the inappropriately named "smart meter" device. There is nothing smart about them. They are dumb and lethal.

Apparently, no one on your staff has any notable understanding of the complexities of electromagnetic and radio frequency fields, nor the intelligence and initiative to ask experts in the field who are not associated with utility providers. Worse than that, you as Commissioners are asking for their guidance. This is a shameful situation.

I have attempted to inform you Commissioners about this issue by sending you relevant emails containing research studies, expert witnesses, etc. and your staffs' response is to produce a one page document demonstrating that either nothing I have sent has been read, or no one understands how to properly interpret what they have read. In either case, it is shameful.

Since you are charged with regulating the utilities, you have a responsibility to protect the public health and that means you will examine all relevant material in detail and seek help where necessary. Along with that process is that you investigate and do further research BEFORE reacting.

Nothing short of a moratorium on the installation of any utility company's "smart meters" is an appropriate and proper resolution of this matter.

I am providing a list of what you have been provided previous to this submission. There will be two exceptions; the Arizona regulatory portion of the "Demand Response and Smart Metering Policy Actions Since The Energy Policy Act of 2005: A Summary for State Officials"

http://www.ncouncil.org/Documents/NCEP_Demand_Response_12081.pdf and "The Energy Policy Act of 2005." As the official Arizona "authority" regarding utility regulation you should have those documents available to you as well as being familiar with their contents. Where a video is involved in the submission, a website address will be noted for your access:

Exhibit 1 contains copies of a cover letter dated 07/16/02 from Frank Marcinowski, Director of the EPA's Radiation Protection Division and correspondence from Norbert N. Hankin, Center for Science and Risk Assessment, Radiation Protection Division, both of the EPA in response to Janet Newton, President of The EMR Network's query regarding her concerns about non-thermal effects of radiofrequency (RF) radiation and the adequacy of the Federal Communications Commission's RF radiation exposure guidelines dated 01/31/02.

Arizona Corporation Commission

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Exhibit 2 "DNA is a fractal antenna in electromagnetic fields"

April 2011, Vol. 87, No. 4, Pages 409-415 (doi:10.3109/09553002.2011.538130)

Martin Blank¹, Reba Goodman²

¹*Departments of Physiology*

²*Pathology, Columbia University, New York, USA*

Martin Blank, PhD, Columbia University, Correspondence: Physiology, 630 W 168 Street, New York 10032, USA. E-mail: mb32@columbia.edu

Purpose: To review the responses of deoxyribonucleic acid (DNA) to electromagnetic fields (EMF) in different frequency ranges, and characterize the properties of DNA as an antenna.

Materials and methods: We examined published reports of increased stress protein levels and DNA strand breaks due to EMF interactions, both of which are indicative of DNA damage. We also considered antenna properties such as electronic conduction within DNA and its compact structure in the nucleus.

Results: EMF interactions with DNA are similar over a range of non-ionising frequencies, i.e., extremely low frequency (ELF) and radio frequency (RF) ranges. There are similar effects in the ionising range, but the reactions are more complex.

***Conclusions:* The wide frequency range of interaction with EMF is the functional characteristic of a fractal antenna, and DNA appears to possess the two structural characteristics of fractal antennas, electronic conduction and self symmetry. These properties contribute to greater reactivity of DNA with EMF in the environment, and the DNA damage could account for increases in cancer epidemiology, as well as variations in the rate of chemical evolution in early geologic history.**

<http://informahealthcare.com/doi/abs/10.3109/09553002.2011.538130>

Exhibit 3 Biological Effects of Electromagnetic Fields EMF Dr. Ted Litovitz, Physicist and EMR Researcher from Catholic University, 07/12/01 US Congressional Briefing

As an expert in the field, Dr. Litovitz presents his findings of the biological effects of EMF. Standard for cell phone radio frequency radiation (RFR) is 1.5W/kg, but that is based on heat emission.

<http://www.youtube.com/watch?v=6IAFbQqyVio&feature=colike>

Read his obituary (and qualifications) here:

<http://www.washingtonpost.com/wp-dyn/content/article/2006/05/05/AR20060505017>

09/26/11 Email to the AZ Corporation and Yavapai County Commissioners from Districts 1-3:

1. The Energy Policy Act of 2005, Section 1252, "Smart Metering" of that Law specifically stipulates "(C) Each electric utility subject to subparagraph (A) shall provide

each customer **requesting** a time-based rate with a time-based meter capable of enabling the utility and customer to offer and receive such rate, respectively.

Page 16 of the Arizona regulatory portion of the "Demand Response and Smart Metering Policy Actions Since The Energy Policy Act of 2005: A Summary for State Officials" http://www.ncouncil.org/Documents/NCEP_Demand_Response_12081.pdf clearly reiterates Federal policy regarding **offering meters to customers who request them**.

2. "Smart metering" is a **generic term** and therefore, there is much variation between these instruments (see "*Demand Response and Smart Metering Policy Actions Since The Energy Policy Act of 2005: A Summary for State Officials*," pgs. 12, 73 and 79). APS has failed to inform its customers and the Arizona Corporation Commission (AZ CC) details about the "smart meters" they are installing; what inspections those particular meters have had, any pertinent certification by Underwriters Laboratory, etc. That is unacceptable to me and should certainly be to the Commission.

3. World Health Organization's declaration that classified smart meters a **Class 2B carcinogen** according to the (100X exposure of cell phone, equivalent of living 500 feet of major cell tower). Furthermore, anyone who has, or had cancer, has a 30% chance of having it again, so any low level of EMF is dangerous alone, but when you multiply that to include every dwelling in one's neighborhood, that compounds the effect. Since I am a thyroid cancer survivor, this is of great concern to me.

4. It appears that APS and the Arizona Corporation Commission have ignored the proper interpretation of the Federal mandate and Arizona's own statement of intention (see "*Demand Response and Smart Metering Policy Actions Since The Energy Policy Act of 2005: A Summary for State Officials*," pgs. 12, 73 and 79)). AZ CC has failed to properly correct APS regarding its misinterpretation of the Federal and State mandate and its so-called public education outreach.

5. AZ CC has NOT taken proper steps by utilizing outside consultants to evaluate APS' various "smart meters" overall safety. Last and not least, my health is of utmost importance to me and as I've stated previously I am not a candidate to be exposed to more radiofrequency than necessary. I call your attention and the Arizona Corporation Commission to the video of Columbia University's Law School "Wireless Hazards Conference in 2009," with Camilla Rees, founder of www.ElectromagneticHealth.org; attorney Whitney North Seymour, Jr., a co-founder of the Natural Resources Defense Council, and Martin Blank, PhD, of the Dept. of Physiology and Cellular Biophysics at Columbia University, a widely published scientist in this field <http://electromagnetichealth.org/electromagnetic-health-blog/columbia-university-law-school-wireless-hazards-panel/>.

11/07/11 Public-health expert David Carpenter . . . says nobody can say there are no adverse health effects from smart meters

<http://www.straight.com/article-518506/vancouver/publichealth-expert-david-carpenter-says-nobody-can-say-there-are-no-adverse-health-effects-smart-meter>

11/12/11 Please learn what this is all about before forcing Arizona citizens to have to move from their homes, neighborhoods, cities and possibly, out of the state.

Info from Sam Milham, MD specialty epidemiologist . . . Smart Meters, Dirty Electricity and Disease - Excerpt:

Smart meters have 2 types of health hazards: RF and Dirty Electricity. Dirty Electricity may be even more harmful than RF. <http://www.youtube.com/watch?v=ci5GGqEPecE>

Info from Duane A. Dahlberg, Ph.D. - Pay special attention to the results of the studies with cows: Ground Currents - An Important Factor in Electromagnetic Exposure
http://www.mikeholt.com/news/archive/html/17/Ground_Currents_09-18-2002.htm

11/15/11 Please excuse any duplicate emails . . . anyone responsible for children's lives need to watch these videos:

Overview - Wi-Fi in Schools: Testing for Microwave Radiation Dangers in the Classroom
<http://www.youtube.com/watch?v=FO0AnNH8vI&feature=related>

Detailed research results - Wi-Fi in Schools Part 2: RF Microwave Radiation Health Risks
<http://www.youtube.com/watch?v=QbfCr-Ip24&feature=share>

WiFi Laptop Emits More Microwave Radiation Than Cell Phone
<http://www.youtube.com/watch?v=hVS37zUMwYQ>

12/16/11 - DOCKET NO. 11-0328 Commissioners Acting Responsibly in the Public Interest

Santa Cruz Board Questions PG&E - SmartMeter ShutOffs

http://www.youtube.com/watch?v=yIGqz_2uGTs&context=C349ec3aADOEgsToPDskLIzIOo61BNWf8ppxW_tIEG

A Santa Cruz commissioner gets it right when he considers that PG & E electric company is calling the shots and forcing "smart meters" onto consumers. Perhaps, he read the law contained in The Energy Policy Act of 2005, section 1252 which expressly says that the meters should only be given to consumers who request them.

The commissioner correctly identifies as the source of the problem originating in the "public agency" whose involvement has been absent (much like as it has been in Arizona). In California that public agency is the California public utility commission. My search for AZ public utility commission indicates that "The Public Utilities Commission (RIPUC) and the Division of Public Utilities and Carriers (DPUC) are independent regulatory bodies whose mission is to ensure that safe, reliable, quality utility service is provided at a fair and reasonable cost."

I am asking all commissioners to exercise their authority in this matter as Arizona's public health and safety regulators.

12/16/11 DOCKET NO. 11-0328 12-15-11 EM-RADIATION RESEARCH TRUST

Check out the website for the two-part report which presents all of the research study results that probably will surprise no one and then check out the questionnaire to find out how electro-sensitive you are. There are measures that can be taken to mitigate some of the radiation for those who are not full-blown electro-sensitive.

Here is the link to get the report that is contained in two parts on The EM-Radiation Research Trust website:

http://www.radiationresearch.org/index.php?option=com_content&view=frontpage&Itemid=19

12/19/11 DOCKET NO. 11-0328 California Public Utility Commission Meter 'Opt-Out' Proposal as Cop Out - Public Comments

"Dear Commissioners and Representatives:

Although it is always appropriate for honoring peace and humanity's responsibilities to its individuals, now more than ever our publicly elected officials need to be fulfilling their duty to protect the safety and welfare of those who put them in their offices.

"Opt out" policies will not alleviate the dangers of electromagnetic and radio frequency pulses to the population.

Clearly, people do not understand that electromagnetic and radio frequency waves cannot be controlled whether originating from cell phones, cell towers or antennas, and most likely more things one cannot even imagine. They cannot be contained. All that can stop these waves is copper netting.

Whoever sold this bill of goods that this was the way to go energy-wise is probably laughing all the way to his Swiss bank account from the proceeds of the billions of "smart-metered" Chinese devices he sold.

http://www.youtube.com/watch?feature=player_embedded&v=riOqTHkhfp8

01/20/12 Transmitting Smart Meters Pose A Serious Threat To Public Health

<http://www.electricalpollution.com/smartmeters.html>

Comments on the Draft Report by the California Council on Science and Technology "Health Impacts of Radio Frequency from Smart Meters" by Daniel Hirsch, 31 January 2011

Excerpt:

When two of the most central errors are corrected – the failure to take into account duty cycles of cell phones and microwave ovens and the failure to utilize the same units (they should compare everything in terms of average whole body exposure) **the cumulative whole body exposure from a Smart Meter at 3 feet appears to be approximately two orders of magnitude higher than that of a cell phone, rather than two orders of magnitude lower.**

<http://www.ccst.us/projects/smart2/documents/letter8hirsch.pdf>

01/24/12 Docket No. 11-0328 AMERICAN ACADEMY OF ENVIRONMENTAL SCIENTISTS Calls for a halt to wireless smart meters

<http://aaemonline.org/images/CaliforniaPublicUtilitiesCommission.pdf>

01/27/12 AZ CC Docket No. 11-0328: Wireless Radiation Causes Changes Proteins Expression in the Brain - may affect memory, learning, Alzheimer's

<http://aaemonline.org/images/CaliforniaPublicUtilitiesCommission.pdf>

01/31/12 AZ CC Docket No. 11-0328 Santa Cruz County Board of Supervisors 01-24-11

Board of Supervisors voted to continue the ordinance for a moratorium on SmartMeter installations in the county; accepted the report from the Public Health Department on harm to health from wireless SmartMeters; and to sign the petition to the CPUC defining problems with the SmartMeter Opt Out proposal.

[http://sccounty01.co.santa-](http://sccounty01.co.santa-cruz.ca.us/bds/Govstream/ASP/Display/SCCB_AgendaDisplayWeb.asp?MeetingDate=1/24/2012)

[cruz.ca.us/bds/Govstream/ASP/Display/SCCB_AgendaDisplayWeb.asp?MeetingDate=1/24/2012](http://sccounty01.co.santa-cruz.ca.us/bds/Govstream/ASP/Display/SCCB_AgendaDisplayWeb.asp?MeetingDate=1/24/2012)

02/13/12 AZ CC Docket No. 11-0328 SOUND SAMPLES OF MANY DIFFERENT FREQUENCIES - EMF - HAARP - RADAR, etc.

"Each electromagnetic source has its own characteristic sound, which is demodulated by broadband-meters to allow evaluating the source from the sound. Although GSM-900 and GSM-1800 can't be differentiated by their sound as it is the same. Other sources are easily detectable; here are a couple of examples. If you'd like to listen to some other source, [please contact us.](#)"

<http://microondes.wordpress.com/emf-sounds/>

02/29/12 AZ CC Docket No. 11-0328 Smart Meters are National Security Risk

Dear Arizona Corporation and County Commissioners:

Please watch this interview with former CIA Director, James Woolsey containing his response to the US Defense Secretary Leon Panetta's remark that a cyber attack could

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AZ CORPORATION COMMISSION - METER GUIDELINE WORKSHOP
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be America's "next Pearl Harbor." Are we prepared to protect our power system against a cyber attack?

Anchor Thalia Assuras talks with former CIA Director James Woolsey about the security measures being used to counter the threat and how smart grid technology could make the country more susceptible to attack."

<http://www.energynow.com/video/2011/08/15/mix-cyber-terrorisms-threat>

Commissioners, it is imperative that you not underestimate your power and authority as commissioners to stop the "smart meter" insanity, otherwise those of us with health concerns will be seeking any legal remediation available to us, as it is a matter of life and death. In addition, you can assume that voters like me will hold your decision accountable at the polls.

Nancy Baer

Nancy Baer, APS Consumer
245 San Patricio Drive
Sedona, AZ 86336



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 8 2002

OFFICE OF
AIR AND RADIATION

Janet Newton
President
The EMR Network
P.O. Box 221
Marshfield, VT 05658

Dear Ms. Newton:

Thank you for your letter of January 31, 2002, to the Environmental Protection Agency Administrator Whitman, in which you express your concerns about non-thermal effects of radiofrequency (RF) radiation and the adequacy of the Federal Communications Commission's RF radiation exposure guidelines. The Administrator has asked us to critically examine the issues you bring to our attention, and we will be responding to you shortly.

We appreciate your interest in the matter of non-thermal RF exposure, possible health risks, and Federal government responsibility to protect human health.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Marciniowski".

Frank Marciniowski, Director
Radiation Protection Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 16 2002

OFFICE OF
AIR AND RADIATION

Ms. Janet Newton
President
The EMR Network
P.O. Box 221
Marshfield, VT 05658

Dear Ms. Newton:

This is in reply to your letter of January 31, 2002, to the Environmental Protection Agency (EPA) Administrator Whitman, in which you express your concerns about the adequacy of the Federal Communications Commission's (FCC) radiofrequency (RF) radiation exposure guidelines and nonthermal effects of radiofrequency radiation. Another issue that you raise in your letter is the FCC's claim that EPA shares responsibility for recommending RF radiation protection guidelines to the FCC. I hope that my reply will clarify EPA's position with regard to these concerns. I believe that it is correct to say that there is uncertainty about whether or not current guidelines adequately treat nonthermal, prolonged exposures (exposures that may continue on an intermittent basis for many years). The explanation that follows is basically a summary of statements that have been made in other EPA documents and correspondence.

The guidelines currently used by the FCC were adopted by the FCC in 1996. The guidelines were recommended by EPA, with certain reservations, in a letter to Thomas P. Stanley, Chief Engineer, Office of Engineering and Technology, Federal Communications Commission, November 9, 1993, in response to the FCC's request for comments on their Notice of Proposed Rulemaking (NPRM), Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation (enclosed).

The FCC's current exposure guidelines, as well as those of the Institute of Electrical and Electronics Engineers (IEEE) and the International Commission on Non-ionizing Radiation Protection, are thermally based, and do not apply to chronic, nonthermal exposure situations. They are believed to protect against injury that may be caused by acute exposures that result in tissue heating or electric shock and burn. The hazard level (for frequencies generally at or greater than 3 MHz) is based on a specific absorption dose-rate, SAR, associated with an effect

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that results from an increase in body temperature. The FCC's exposure guideline is considered protective of effects arising from a thermal mechanism but not from all possible mechanisms. Therefore, the generalization by many that the guidelines protect human beings from harm by any or all mechanisms is not justified.

These guidelines are based on findings of an adverse effect level of 4 watts per kilogram (W/kg) body weight. This SAR was observed in laboratory research involving acute exposures that elevated the body temperature of animals, including nonhuman primates. The exposure guidelines did not consider information that addresses nonthermal, prolonged exposures, i.e., from research showing effects with implications for possible adversity in situations involving chronic/prolonged, low-level (nonthermal) exposures. Relatively few chronic, low-level exposure studies of laboratory animals and epidemiological studies of human populations have been reported and the majority of these studies do not show obvious adverse health effects. However, there are reports that suggest that potentially adverse health effects, such as cancer, may occur. Since EPA's comments were submitted to the FCC in 1993, the number of studies reporting effects associated with both acute and chronic low-level exposure to RF radiation has increased.

While there is general, although not unanimous, agreement that the database on low-level, long-term exposures is not sufficient to provide a basis for standards development, some contemporary guidelines state explicitly that their adverse-effect level is based on an increase in body temperature and do not claim that the exposure limits protect against both thermal and nonthermal effects. The FCC does not claim that their exposure guidelines provide protection for exposures to which the 4 W/kg SAR basis does not apply, i.e., exposures below the 4 W/kg threshold level that are chronic/prolonged and nonthermal. However, exposures that comply with the FCC's guidelines generally have been represented as "safe" by many of the RF system operators and service providers who must comply with them, even though there is uncertainty about possible risk from nonthermal, intermittent exposures that may continue for years.

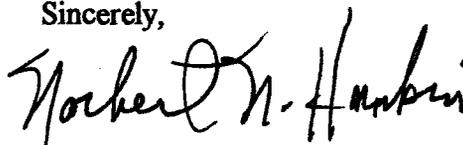
The 4 W/kg SAR, a whole-body average, time-average dose-rate, is used to derive dose-rate and exposure limits for situations involving RF radiation exposure of a person's entire body from a relatively remote radiating source. Most people's greatest exposures result from the use of personal communications devices that expose the head. In summary, the current exposure guidelines used by the FCC are based on the effects resulting from whole-body heating, not exposure of and effect on critical organs including the brain and the eyes. In addition, the maximum permitted local SAR limit of 1.6 W/kg for critical organs of the body is related directly to the permitted whole body average SAR (0.08 W/kg), with no explanation given other than to limit heating.

I also have enclosed a letter written in June of 1999 to Mr. Richard Tell, Chair, IEEE SCC28 (SC4) Risk Assessment Work Group, in which the members of the Radiofrequency Interagency Work Group (RFIAWG) identified certain issues that they had determined needed to be addressed in order to provide a strong and credible rationale to support RF exposure guidelines.

Federal health and safety agencies have not yet developed policies concerning possible risk from long-term, nonthermal exposures. When developing exposure standards for other physical agents such as toxic substances, health risk uncertainties, with emphasis given to sensitive populations, are often considered. Incorporating information on exposure scenarios involving repeated short duration/nonthermal exposures that may continue over very long periods of time (years), with an exposed population that includes children, the elderly, and people with various debilitating physical and medical conditions, could be beneficial in delineating appropriate protective exposure guidelines.

I appreciate the opportunity to be of service and trust that the information provided is helpful. If you have further questions, my phone number is (202) 564-9235 and e-mail address is hankin.norbert@epa.gov.

Sincerely,



Norbert Hankin
Center for Science and Risk Assessment
Radiation Protection Division

Enclosures:

- 1) letter to Thomas P. Stanley, Chief Engineer, Office of Engineering and Technology, Federal Communications Commission, November 9, 1993, in response to the FCC's request for comments on their Notice of Proposed Rulemaking (NPRM), Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation
- 2) June 1999 letter to Mr. Richard Tell, Chair, IEEE SCC28 (SC4) Risk Assessment Work Group from the Radiofrequency Radiation Interagency Work Group



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January 19, 2012

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Decision Proposed Decision of Commissioner Peevy (Mailed 11/22/2011)
BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
On the proposed decision 11-03-014

Dear Commissioners:

The Board of the American Academy of Environmental Medicine opposes the installation of wireless "smart meters" in homes and schools based on a scientific assessment of the current medical literature (references available on request). Chronic exposure to wireless radiofrequency radiation is a preventable environmental hazard that is sufficiently well documented to warrant immediate preventative public health action.

As representatives of physician specialists in the field of environmental medicine, we have an obligation to urge precaution when sufficient scientific and medical evidence suggests health risks which can potentially affect large populations. The literature raises serious concern regarding the levels of radio frequency (RF - 3KHz – 300 GHz) or extremely low frequency (ELF – 300Hz) exposures produced by "smart meters" to warrant an immediate and complete moratorium on their use and deployment until further study can be performed. The board of the American Board of Environmental Medicine wishes to point out that existing FCC guidelines for RF safety that have been used to justify installation of "smart meters" only look at thermal tissue damage and are obsolete, since many modern studies show metabolic and genomic damage from RF and ELF exposures below the level of intensity which heats tissues. The FCC guidelines are therefore inadequate for use in establishing public health standards. More modern literature shows medically and biologically significant effects of RF and ELF at lower energy densities. These effects accumulate over time, which is an important consideration given the chronic nature of exposure from "smart meters". The current medical literature raises credible questions about genetic and cellular effects, hormonal effects, male fertility, blood/brain barrier damage and increased risk of certain types of cancers from RF or ELF levels similar to those emitted from "smart meters". Children are placed at particular risk for altered brain development, and impaired learning and behavior. Further, EMF/RF adds synergistic effects to the damage observed from a range of toxic chemicals. Given the widespread, chronic, and essentially inescapable ELF/RF exposure of everyone living near a "smart meter", the Board of the American Academy of Environmental Medicine finds it unacceptable from a public health standpoint to implement this technology until these serious medical concerns are resolved. We consider a moratorium on installation of wireless "smart meters" to be an issue of the highest importance.

The Board of the American Academy of Environmental Medicine also wishes to note that the US NIEHS National Toxicology Program in 1999 cited radiofrequency radiation as a potential carcinogen. Existing safety limits for pulsed RF were termed “not protective of public health” by the Radiofrequency Interagency Working Group (a federal interagency working group including the FDA, FCC, OSHA, the EPA and others). Emissions given off by “smart meters” have been *classified by the World Health Organization International Agency for Research on Cancer (IARC) as a Possible Human Carcinogen.*

Hence, we call for:

- An immediate moratorium on “smart meter” installation until these serious public health issues are resolved. Continuing with their installation would be extremely irresponsible.
- Modify the revised proposed decision to include hearings on health impact in the second proceedings, along with cost evaluation and community wide opt-out.
- Provide immediate relief to those requesting it and restore the analog meters.

Members of the Board
American Academy of Environmental Medicine