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May 29, 2013

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Arizona Corporation Commission
Docket Control
1200 W. Washington St.
Phoenix, AZ 85007

Docket E-00000C-11-0328 Smart Meters

To Whom It May Concern:

This filing for the Smart meter docket #E-00000C-11-0328 contains an original filing plus 13 copies and is being filed on behalf of the Safer Utilities Network.

Sincerely,

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Enl.: Certificate of Service

Arizona Corporation Commission

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AZ CORP COMMISSION
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Docket E-00000C-11-0328 Smart Meters

**The BioInitiative report documents health effects far below the
current RF limits in the United States**

Dear Commissioners,

We have seen the argument made by the purveyors of wireless devices, such as smart meters, that since their wares emit radiation within the current legal limits, they are safe.

The current radio frequency (RF) limits were set by the Federal Communications Commission (FCC) in 1997. This was in the early years of the cell phone age.

Since 1997 the body of science on health effects from RF radiation has grown tremendously. Thousands of scientific studies are now available which demonstrate biological effects from levels far below the current FCC limits.

The landmark BioInitiative report was released in an updated edition in December 2012. It is written by 29 scientists and health professionals from ten countries. The United States has the strongest representation, with ten members.

A particular strength of this work is that the authors are free of political and monetary influences, which is a problem with many entities that issue opinions in this area, such as the FCC, EPRI, ICNIRP, and COMAR.¹

The BioInitiative report distills and presents the state of the science on health effects from low levels of electromagnetic radiation. One of the key findings is that today's exposure limits are not protecting the public health.

In the report's summary, we find:

¹ See our filing in this docket (ACC E-00000C-11-0328) on April 29, 2013 for documentation of how special interests influence science in this area.

Not everything is known yet about this subject; but what is clear is that the existing public safety standards limiting these radiation levels in nearly every country of the world look to be thousands of times too lenient. Changes are needed.

The radiation limits set by the FCC for the United States are some of the most lenient in the world.

The FCC limits are based on an outdated model of the human body and only consider the heating of the tissues (like a microwave oven). It has not considered other biological effects that are now documented, such as that RF can break DNA and cause the blood-brain barrier to leak. The FCC model is based on a healthy adult male and does not consider the more vulnerable fetuses, children and people with disabilities.

The FCC limits were set in an age of analog continuous communication. Today, pulsed signals are the norm, which appears to be more harmful. The FCC standards do not make any distinction.

The BioInitiative report is written for policy-makers. It avoids technical jargon and provides several levels of detail. The content is summarized in a single section, with more explanations in the following three sections. The rest of the report contains several articles about specific kinds of health effects.

The entire report is very long. It is not practical to enter this report into the docket, but we have provided the title page and the table of contents. The individual parts of the report are easily accessible on the dedicated website:

www.bioinitiative.org

We urge the commission to give great consideration to this important work.

Submitted on behalf of:
Safer Utilities Network
P.O. Box 1523
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BioInitiative 2012

A Rationale for Biologically-based Exposure Standards for Low-Intensity Electromagnetic Radiation

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BioInitiative Report: A Rationale for Biologically-based Public Exposure Standards for Electromagnetic Radiation at
www.bioinitiative.org, December 31, 2012

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* denotes new chapter