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8 IN THE MATTER OF THE COMMISSION'S
 9 INVESTIGATION OF VALUE AND
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 NOTICE OF ERRATA

13 My most recent May 6, 2016 thirty seven page posting in this docket¹, included a
 14 seven page document by the **American Academy of Environmental Medicine (AAEM):**
 15 **Electromagnetic and Radiofrequency Fields Effect on Human Health**, which I hope
 16 you all received. However, the posting by Docket Control curiously did not include the
 17 seven above mentioned document pages for the online representation of the hard copy
 18 delivery, necessitating some form of completion in this matter by me. Am taking this
 19 opportunity to add a one page, **Electromagnetic and Radiofrequency Fields Effects on**
 20 **Human Health Position Paper Summary** for your convenience.

21 Please note that on page 4, the AAEM asks for the "**Use of safer technology,**
 22 **including for Smart Meters, such as hard-wiring, fiber optic or other non-harmful**
 23 **methods of data transmission.**"

24 Respectfully submitted
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28 ¹ <http://images.edocket.azcc.gov/docketpdf/0000170158.pdf>



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Electromagnetic and Radiofrequency Fields Effects on Human Health Position Paper Summary

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- AAEM has been studying and treating the effects of the environment on health for over 50 years.
- AAEM physicians have been seeing patients who are symptomatic from electromagnetic frequency (EMF) exposure for more than 20 years.
- There has been a massive increase in radiofrequency (RF) exposure from wireless devices *and* reports of hypersensitivity and disease due to EMF and RF exposure in the last 5 years.
- Multiple studies correlate EMF and RF exposure with the following:
 - Neurological disease - Parkinson's, Alzheimer's, Lou Gehrig's disease, headaches, dizziness, ADD, anxiety, depression, sleep disorders, fatigue, tremors, unconsciousness, memory loss, autonomic nervous system dysfunction, paresthesias, visual disruption
 - Cardiac disease - Arrhythmia, tachycardia, edema, flushing
 - Lung disease - chest tightness, difficulty breathing, decreased lung function
 - Reproductive disorders, genetic defects, cancer
 - Immune dysfunction
 - Electromagnetic Hypersensitivity
 - Musculoskeletal effects - pain, muscle spasm
 - Gastrointestinal effects
 - Dermal effects - itching, burning, pain
- Electromagnetic Hypersensitivity has been documented in controlled, double blinded trials.
- EMF and RF fields act over long distances, imprinting the body with these fields, creating long lasting, adverse health effects.
- The interaction of electromagnetic fields and human bodies has long range effects, which cannot be shielded.
- The human body is affected by the magnetic vector component of the electromagnetic field, which cannot be shielded.
- Understanding is needed that Electromagnetic Hypersensitivity is a growing world wide problem.
- Accommodation for health conditions regarding EMF and RF exposure are needed.
- Control of this electrical environment is needed to protect society.
- Safer technology is needed.
- Independent studies are needed to understand health effects from EMF and RF exposure.
- Immediate caution on Smart Meter installation is needed.

References available in the full AAEM position paper:
http://aaemonline.org/emf_rf_position.html

Submitted by Amy L. Dean, DO, FAAEM



American Academy of Environmental Medicine

Electromagnetic and Radiofrequency Fields Effect on Human Health

For over 50 years, the American Academy of Environmental Medicine (AAEM) has been studying and treating the effects of the environment on human health. In the last 20 years, our physicians began seeing patients who reported that electric power lines, televisions and other electrical devices caused a wide variety of symptoms. By the mid 1990's, it became clear that patients were adversely affected by electromagnetic fields and becoming more electrically sensitive. In the last five years with the advent of wireless devices, there has been a massive increase in radiofrequency (RF) exposure from wireless devices as well as reports of hypersensitivity and diseases related to electromagnetic field and RF exposure. Multiple studies correlate RF exposure with diseases such as cancer, neurological disease, reproductive disorders, immune dysfunction, and electromagnetic hypersensitivity.

The electromagnetic wave spectrum is divided into ionizing radiation such as ultraviolet and X-rays and non-ionizing radiation such as ultrasound and radiofrequency (RF), which includes WiFi, cell phones, and Smart Meter wireless communication. It has long been recognized that ionizing radiation can have a negative impact on health. However, the effects of non-ionizing radiation on human health recently have been seen. Discussions and research of non-ionizing radiation effects centers around thermal and non-thermal effects. According to the FCC and other regulatory agencies, only thermal effects are relevant regarding health implications and consequently, exposure limits are based on thermal effects only.¹

While it was practical to regulate thermal bioeffects, it was also stated that non-thermal effects are not well understood and no conclusive scientific evidence points to non-thermal based negative health effects.¹ Further arguments are made with respect to RF exposure from WiFi, cell towers and smart meters that due to distance, exposure to these wavelengths are negligible.² However, many *in vitro*, *in vivo* and epidemiological studies demonstrate that significant harmful biological effects occur from non-thermal RF exposure and satisfy Hill's criteria of causality.³ Genetic damage, reproductive defects, cancer, neurological degeneration and nervous system dysfunction, immune system

dysfunction, cognitive effects, protein and peptide damage, kidney damage, and developmental effects have all been reported in the peer-reviewed scientific literature.

Genotoxic effects from RF exposure, including studies of non-thermal levels of exposure, consistently and specifically show chromosomal instability, altered gene expression, gene mutations, DNA fragmentation and DNA structural breaks.⁴⁻¹¹ A statistically significant dose response effect was demonstrated by Maschevich *et al.*, who reported a linear increase in aneuploidy as a function of the Specific Absorption Rate(SAR) of RF exposure.¹¹ Genotoxic effects are documented to occur in neurons, blood lymphocytes, sperm, red blood cells, epithelial cells, hematopoietic tissue, lung cells and bone marrow. Adverse developmental effects due to non-thermal RF exposure have been shown with decreased litter size in mice from RF exposure well below safety standards.¹² The World Health Organization has classified RF emissions as a group 2 B carcinogen.¹³ Cellular telephone use in rural areas was also shown to be associated with an increased risk for malignant brain tumors.¹⁴

The fact that RF exposure causes neurological damage has been documented repeatedly. Increased blood-brain barrier permeability and oxidative damage, which are associated with brain cancer and neurodegenerative diseases, have been found.^{4,7,15-17} Nittby *et al.* demonstrated a statistically significant dose-response effect between non-thermal RF exposure and occurrence of albumin leak across the blood-brain barrier.¹⁵ Changes associated with degenerative neurological diseases such as Alzheimer's, Parkinson's and Amyotrophic Lateral Sclerosis (ALS) have been reported.^{4,10} Other neurological and cognitive disorders such as headaches, dizziness, tremors, decreased memory and attention, autonomic nervous system dysfunction, decreased reaction times, sleep disturbances and visual disruption have been reported to be statistically significant in multiple epidemiological studies with RF exposure occurring non-locally.¹⁸⁻²¹

Nephrotoxic effects from RF exposure also have been reported. A dose response effect was observed by Ingole and Ghosh in which RF exposure resulted in mild to extensive degenerative changes in chick embryo kidneys based on duration of RF exposure.²⁴ RF emissions have also been shown to cause isomeric changes in amino acids that can result in nephrotoxicity as well as hepatotoxicity.²⁵

Electromagnetic field (EMF) hypersensitivity has been documented in controlled and double blind studies with exposure to various EMF frequencies. Rea *et al.* demonstrated that under double blind placebo controlled conditions, 100% of subjects showed reproducible reactions to that frequency

to which they were most sensitive.²² Pulsed electromagnetic frequencies were shown to consistently provoke neurological symptoms in a blinded subject while exposure to continuous frequencies did not.²³

Although these studies clearly show causality and disprove the claim that health effects from RF exposure are uncertain, there is another mechanism that proves electromagnetic frequencies, including radiofrequencies, can negatively impact human health. Government agencies and industry set safety standards based on the narrow scope of Newtonian or “classical” physics reasoning that the effects of atoms and molecules are confined in space and time. This model supports the theory that a mechanical force acts on a physical object and thus, long-range exposure to EMF and RF cannot have an impact on health if no significant heating occurs. However, this is an incomplete model. A quantum physics model is necessary to fully understand and appreciate how and why EMF and RF fields are harmful to humans.^{26,27} In quantum physics and quantum field theory, matter can behave as a particle or as a wave with wave-like properties. Matter and electromagnetic fields encompass quantum fields that fluctuate in space and time. These interactions can have long-range effects which cannot be shielded, are non-linear and by their quantum nature have uncertainty. Living systems, including the human body, interact with the magnetic vector potential component of an electromagnetic field such as the field near a toroidal coil.^{26,28,29} The magnetic vector potential is the coupling pathway between biological systems and electromagnetic fields.^{26,27} Once a patient’s specific threshold of intensity has been exceeded, it is the frequency which triggers the patient’s reactions.

Long range EMF or RF forces can act over large distances setting a biological system oscillating in phase with the frequency of the electromagnetic field so it adapts with consequences to other body systems. This also may produce an electromagnetic frequency imprint into the living system that can be long lasting.^{26,27,30} Research using objective instrumentation has shown that even passive resonant circuits can imprint a frequency into water and biological systems.³¹ These quantum electrodynamic effects do exist and may explain the adverse health effects seen with EMF and RF exposure. These EMF and RF quantum field effects have not been adequately studied and are not fully understood regarding human health.

Because of the well documented studies showing adverse effects on health and the not fully understood quantum field effect, AAEM calls for exercising precaution with regard to EMF, RF and general frequency exposure. In an era when all society relies on the benefits of electronics, we must find ideas and technologies that do not disturb bodily function. It is clear that the human body uses electricity from the chemical bond to the nerve impulse and obviously this orderly sequence can be

disturbed by an individual-specific electromagnetic frequency environment. Neighbors and whole communities are already exercising precaution, demanding abstention from wireless in their homes and businesses.

Furthermore, the AAEM asks for:

- An immediate caution on Smart Meter installation due to potentially harmful RF exposure.
- Accommodation for health considerations regarding EMF and RF exposure, including exposure to wireless Smart Meter technology.
- Independent studies to further understand the health effects from EMF and RF exposure.
- Recognition that electromagnetic hypersensitivity is a growing problem worldwide.
- Understanding and control of this electrical environmental bombardment for the protection of society.
- Consideration and independent research regarding the quantum effects of EMF and RF on human health.
- Use of safer technology, including for Smart Meters, such as hard-wiring, fiber optics or other non-harmful methods of data transmission.

Submitted by: Amy L. Dean, DO, William J. Rea, MD, Cyril W. Smith, PhD, Alvis L. Barrier, MD

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