



March 26, 2019

Honorable Rob Wagner
Chair, Senate Education Committee
Oregon Senate
900 Court St. NE, S-213
Salem, OR 97301

Dear Chair Wagner:

On behalf of CTIA, the trade association for the wireless communications industry, I submit this letter to address concerns with Oregon Senate Bill 282 and Senate Bill 283. Wireless devices marketed and sold in the United States are comprehensively regulated at the federal level and have been deemed safe by federal regulators and other impartial experts. In addition, radiofrequency energy (RF) from antennas used by cell phones result in exposure levels on the ground that are typically thousands of times below safety limits set by the Federal Communications Commission (FCC). These safety standards include significant extra margins of safety for tower workers and the public. They are based on guidance from internationally recognized expert non-government organizations whose scientists and engineers study and develop mobile technology standards, and approved and overseen by federal agencies responsible for health and safety. As a result, the scientific consensus is that towers and base stations pose no health hazard to nearby residents or students.

The leading federal regulatory agencies with authority over wireless device compliance have concluded there are no known adverse health risks associated with wireless device use. The U.S. Food and Drug Administration concludes that, "[t]he scientific evidence does not show a danger to any users of cell phones from RF [radiofrequency] exposure, including children and teenagers."¹ The FCC advises that, "[s]ome health and safety interest groups have interpreted certain reports to suggest that wireless device use may be linked to cancer and other illnesses, posing potentially greater risks for children than adults. While these assertions have gained increased public attention, currently no scientific evidence establishes a causal link between wireless device use and cancer or other illnesses."² In addition, the World Health Organization (WHO) advises that, "[a] large number of studies have been performed over the last two decades to assess whether mobile phones pose a potential health risk. To date, no adverse health effects have

¹ See "Children and Cell Phones," available at: <http://www.fda.gov/Radiation-EmittingProducts/RadiationEmittingProductsandProcedures/HomeBusinessandEntertainment/CellPhones/ucm116331.htm> (last visited March 22, 2019).

² See "Wireless Devices and Health Concerns," available at: <http://www.fcc.gov/cgb/consumerfacts/mobilephone.html> (last visited March 22, 2019).



been established as being caused by mobile phone use."³ In short, respected authorities responsible for studying this issue agree that there is no evidence of health risks from cell phones.

Cell phones marketed and sold in the U.S. are comprehensively regulated by the federal government and must comply with standards designed to protect consumers. These devices are subject to some of the most demanding RF emission standards in the world. Wireless devices that comply with these standards "are safe for use by the general public and may be sold in the United States."⁴ The FCC's RF standards for cell phones incorporate a fifty-fold safety factor for human exposure. The FCC holds that its "safety factor can well accommodate a variety of variables such as different physical characteristics and individual sensitivities - and even the potential for exposures to occur in excess of our limits without posing a health hazard to humans."⁵

Moreover, with regard to wireless networks, the WHO advises that "[f]rom all evidence accumulated so far, no adverse short- or long-term health effects have been shown to occur from the RF signals produced by base stations.⁶ The WHO continues that "[s]ince wireless networks produce generally lower RF signals than base stations, no adverse health effects are expected from exposure to them."⁷

Thank you for the opportunity to submit this letter and to address concerns with this legislation.

Sincerely,

Gerard Keegan

³ See "Electromagnetic fields and public health: mobile phones," available at: <http://www.who.int/mediacentre/factsheets/fs193/en/index.html> (last visited March 22, 2019).

⁴ See *Murray v. Motorola, Inc.*, 982 A.2d 764, 777-78 (D.C. 2009) (citing FCC determination).

⁵ *Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies*, Notice of Inquiry, FCC 13-39 (rel Mar. 29, 2013) ("NOI") at ¶ 236.

⁶ See "Electromagnetic Fields and Public Health: Base stations and Wireless Technologies," available at: <https://www.who.int/peh-emf/publications/facts/fs304/en/> (last visited March 22, 2019).

⁷ *Id.*