



October 2, 2017

Ajit Pai, Chairman
Mignon Clyburn, Commissioner
Michael O’Rielly, Commissioner
Brendan Carr, Commissioner
Jessica Rosenworcel, Commissioner

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies (ET Docket No. 13-84)

Dear Chairman Pai, Commissioner Clyburn, Commissioner O’Rielly, Commissioner Carr, and Commissioner Rosenworcel:

On behalf of the National Association of Telecommunications Officers and Advisors (NATOA), the National League of Cities (NLC), the National Association of Counties (NACo), the U.S. Conference of Mayors (USCM) and all of the respective constituencies that we represent, we respectfully write to request that the Federal Communications Commission (FCC) undertake a comprehensive review of its current radio frequency (RF) emission rules.

As a background, nearly four years ago, local government commenters urged the Commission to undertake a comprehensive review of its RF emission rules and work to provide timely updates in light of the best, independent scientific research from around the world. This position was not premised on any belief that the current rules are obsolete, too strict, or too lenient. Rather, it was based on the fact that the current rules were adopted in 1996. At that time, “cell phone use by children was rare, smart phones did not exist, cell phone cases were virtually unheard of, and the FCC assumed consumers would use belt clips or holsters to carry their phones.”¹

In addition, the deployment of new technologies – especially small cells – in our communities has raised new concerns with the current standards. While local governments may not regulate the siting of personal wireless service facilities on the basis of the environmental effects of RF emissions, local government officials are often faced with residents raising RF concerns with the siting of new wireless facilities in the public rights-of-way. While a comprehensive review of the current rules may not alleviate all consumer concerns, we believe it would go a long way in

¹ City and County of San Francisco Comments at 4.

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providing badly needed assistance to local government officials when faced with questions regarding RF emissions and the public's health and safety.

The time for the Commission to take action in this proceeding is NOW.

Respectfully submitted,



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