

From: [Laura Legere](#)
To: [DOH EPH RP Info](#)
Subject: Public comment-wi-fi in schools ~ Resubmitting with city address
Date: Sunday, March 02, 2014 9:14:08 PM
Attachments: [Wi-Fi Safety Draft Report Comments Addendum.pdf](#)
[ATT602079.htm](#)
[signature book cover.jpg](#)
[ATT602080.htm](#)
[2011-gold-1.jpg](#)
[ATT602081.htm](#)

Dear WA DOH?OSPI,

Karen Nold's findings align with my own research. It is imperative that you read the attached PDF and remove Wi-Fi from our schools for our kid's health and well being.

COMMENTS ON “Responding to Wi-Fi Safety Concerns in Our Schools, January 2014 Working Draft”
ADDENDUM to February 3 Submission

Karen Nold, Means For Change, Personal Information ..., Snoqualmie, WA 98065, Personal Information - Privacy - RCW 42.56.230..

Washington State Department of Health (DOH) & Office of Superintendent of Public Instruction (OSPI)
Public Comments EMAIL: RadiationInfo@doh.wa.gov

February 10, 2014

The draft report has several ‘loopholes’ **discrediting the state’s assertion that wireless is safe**. Proclaiming to “maintain the highest standards of accountability and ethics” with a mission “to work to protect and improve the health of people in Washington State”, it is appalling the **DOH has been caught hiding the risks** of wireless radiation, via Washington State Public Records Act documents. The state **blatantly ignored studies** indicating harmful effects of wireless radiation. The **report was diluted** with 13 documents which must be disqualified from the final report. The credibility of this report is in question; therefore an impartial, accurate, ethical, and accountable safety review must be addressed immediately.

The Washington State Department of Health has been caught hiding the documented risks of wireless radiation:

1. Document 7 (p35): for children/small individuals ICNIRP standards around 2 GHz are not correct. (Wi-Fi: 2.4 GHz)
2. Document 13 – 2005 France was cited as ‘no definitive conclusions’. The state was asked to acknowledge, from the same agency, the 2013 **“Update of the ‘Radiofrequencies and health’ expert appraisal”**¹ recommending limiting exposure to RF. In a November 07, 2013 email, DOH admitted receipt of this “Update”, and that it “probably meets our criteria”; however it was omitted, further illustrating **the authors of the DOH/OSPI report were biased and their conclusions that Wi-Fi is safe for children are false and not supported.**
3. In a December 23, 2013 DOH/OSPI email containing an earlier version of the draft report², we find:
 - a. The state correctly cites Health England, below, however in the same sentence in the final draft it is incorrectly cited as Health Council of Netherlands. A note in brackets attempts to downplay the dangers:

“One report (Health England) actually measured the exposure to RF in school settings, and concluded that as long as manufacturer’s recommendations were being followed, the safety thresholds used in the ICNIRP were not exceeded. [**re-word so does not imply danger if recommendations are not followed**]”.
 - b. The earlier draft implied biological effects of wireless radiation, but it was omitted from the final draft:

“ICNIRP standards focus on thermal effects as only likely danger...”
 - c. In the earlier draft, we see the state prepared to reference the Precautionary Principle under ‘Documents Review Process’:

“the working group summarized... c) the documents’ position on how the precautionary principle applies, if given.”

However, **the Final Draft only mentions the Precautionary Principle in the Glossary** and the following France 2005 Conclusion (document 13) was omitted:

¹ http://www.anses.fr/sites/default/files/documents/PRES2013CPA18EN_0.pdf

² http://meansforchange.org/Portals/0/FILES/2013/12/DraftReport_Appendices-12-23-13a-DS-eo-DS.docx

“Regarding cell phones: they **recommend a precautionary approach to reduce cell phone RF exposure** by using hands-free kits, buying phones with low SAR levels, etc.”

The state **blatantly ignored** studies presented to them, indicating potential risk and exposure reduction, including the:

1. 2013 British Columbia Centre for Disease Control and National Collaborating Centre for Environmental Health, **Radiofrequency Toolkit for Environmental Health Practitioners**,³ **finding decreased sperm motility with increased use of cell phones and recommends limiting cell phone use and keeping away from male genital area.**
2. 2009 U.S. Department of Health and Human Services, National Institutes of Health, and National Cancer Institute, **Reducing Environmental Cancer Risk, What We Can Do Now**⁴ **finding prolonged RF exposure may have deleterious effects on health and to eliminate/minimize exposures to protect children.**

In addition, the state **diluted their report**, observed in my February 3 submission⁵ finding 7 of the 16 documents must be disqualified for review due to no supporting data, industry conflict, or simply a lack of meeting the state’s own definition of a health agency - provided in an October 4, 2013 email.

Upon further review, one or more contributors from 9 of the 16 documents were found to hold ICNIRP membership at the time the report was prepared. According to the ICNIRP Charter, it “shall maintain a close liaison and working relation with the Executive Council of IRPA”; shall submit its formal recommendations for comment by the IRPA, prior to publication; and “shall receive from IRPA an annual grant to provide support” for ICNIRP’s work.

This is a conflict of interest. In the IRPA Constitution, Article II, it states the primary objective of IRPA:

“is to provide a medium whereby international contacts and co operation may be promoted among those engaged in radiation protection work... in the effort to provide for the protection of people and the environment from the hazards caused by ionizing and non ionizing radiation and **thereby to facilitate in fact the exploitation of radiation and nuclear energy for the benefit of mankind.**”

IRPA helps fund ICNIRP and IRPA’s primary objective is the development of wireless radiation technology; therefore the following documents must be excluded from the final report due to potential industry conflict.

Documents with Known ICNIRP Member Contributors

| | |
|--|---|
| Doc. 1 - Eric Van Rongen | Doc. 7 - Eric Van Rongen |
| Doc. 2 - Eric Van Rongen, Bernard Veyret | Doc. 10 - A. Ahlbom |
| Doc. 4 - A.J Swerdlow, M. Feychting | Doc. 12 - Michael Repacholi, Eric Van Rongen, A. Ahlbom |
| Doc. 5 - Zenon Sienkiewicz | Doc. 13 - Paolo Vecchia, Bernard Veyret |
| Doc. 6 - Maria Feychting | |

Therefore, substantiated in my previous and current comments, documents 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, and 14 must be excluded from the final report and the following must be recognized in the final draft: the WHO’s determination of RF as possibly carcinogenic; the omitted precautionary measures from documents 15 and 16; and the findings of the above omitted 2013 French Expert Appraisal, 2013 BCCDC, and 2009 U.S. DHHS documents.

Our children are not experiments. In the midst of this political debate, the state must err on the side of caution and discontinue Wi-Fi use immediately – it can’t be **proven** safe. It is expected the final report display impartiality, accuracy, and better judgment.

Respectfully,

Karen Nold
Means For Change

³ <http://meansforchange.org/Health-Effects/British-Columbia-CDC-Report>

⁴ <http://meansforchange.org/Health-Effects/2009-US-Presidents-Cancer-Panel-Report>

⁵ <http://meansforchange.org/Portals/0/FILES/2014/02/Wi-Fi%20Safety%20Draft%20Report%20Comments.pdf>