Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies	)	ET Docket No. 13-84
	)	
	)	
Proposed Changes in the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields	)	ET Docket No. 03-137
	)	

REPLY COMMENTS OF THE TELECOMMUNICATIONS INDUSTRY ASSOCIATION

I. INTRODUCTION

The Telecommunications Industry Association ("TIA")[1] hereby submits these brief reply comments in response to the Commission's First Report & Order, Further Notice of Proposed Rulemaking, and Notice of Inquiry ("R&O," "FNPRM," or "NOI") in this proceeding.[2]

---

[1] TIA is a trade association based in the Washington, DC area which represents approximately 500 global information and communications technology ("ICT") manufacturers, vendors, and suppliers. TIA represents the global ICT industry through standards development, advocacy, business opportunities, market intelligence, and networking. TIA's member companies manufacture or supply the products and services used in global communications across all technology platforms. Since 1924, TIA has been enhancing the business environment for broadband, mobile wireless, information technology, networks, cable, satellite and unified communications. Members' products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment, and entertainment. TIA is accredited by the American National Standards Institute ("ANSI"). TIA represents its members on the full range of public policy issues affecting the ICT industry and forges consensus on industry standards. Please see TIA's 2013 Policy Playbook, which provides an overview of the ICT market, technologies, and policies that drive innovation and investment. *See* http://www.tiaonline.org/policy/tia-2013-playbook.

[2] Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies, Proposed Changes in the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields, *First Report & Order, Further Notice of Proposed Rulemaking, Notice of Inquiry*, ET Docket Nos. 13-84, 03-137 (rel. Mar. 29, 2013) ("FNPRM," or "NOI"). Due to the government shutdown in October of 2013, the Commission extended the comment period in this matter from November 1, 2013 until November 18, 2013. *See Revised Filing Deadlines Following Resumption of Normal Commission Operations*, Public Notice, DA 13-2025 (rel Oct. 17, 2013).

II. DISCUSSION

A. THE RECORD DEMONSTRATES STRONG SCIENTIFIC SUPPORT FOR THE COMMISSION TO GLOBALLY HARMONIZE ITS EXPOSURE STANDARD

In TIA's comments, this assertion was based on: (1) the consensus views of expert health and safety organizations that have reviewed the existing scientific evidence, and (2) the economic benefits that result from the global harmonization of standards.[3] TIA believes that the record shows a cognizant agreement among key constituents[4] that the Commission should harmonize its exposure standard with the internationally-accepted 2.0 W/kg averaged over 10 grams value for General Population/Uncontrolled specification limit. Notably absent from the record is credible scientific evidence which would contradict that put forward by the proponents of global harmonization.

As the Commission notes, it originally relied upon a standard developed by scientific experts in adopting its current threshold.[5] As described by the IEEE among other stakeholders, that same standard has been changed by IEEE based on the consensus of that same body of experts through a transparent and open process which was accepted and incorporated by the

---

3 *See* Comments of TIA, ET Docket Nos. 13-84 and 03-137 (filed Sept. 13, 2013) ("TIA Comments").

4 *See, e.g.*, Comments of the Association for Advancement of Medical Instrumentation Cardiac Rhythm Management Device Committee, ET Docket Nos. 13-84 and 03-137 (filed Sept. 13, 2013) at 2; Comments of the Consumer Electronics Association, ET Docket Nos. 13-84 and 03-137 (filed Sept. 13, 2013) at 6 ("CEA Comments"); Comments of CTIA – The Wireless Association, ET Docket Nos. 13-84 and 03-137 (filed Sept. 13, 2013) at 31-33 ("CTIA Comments"); Comments of the Mobile Manufacturers Forum, ET Docket Nos. 13-84 and 03-137 (filed Sept. 13, 2013) at 16-20, 36-42 ("MMF Comments"); Comments of the GSM Association, ET Docket Nos. 13-84 and 03-137 (filed Sept. 13, 2013) at 2-4 ("GSMA Comments"); Comments of the International Committee on Electromagnetic Safety of the Institute of Electrical and Electronics Engineers, ET Docket Nos. 13-84 and 03-137 (filed Sept. 13, 2013) at 2-7 ("IEEE Comments"), Comments of Motorola Solutions, Inc., ET Docket Nos. 13-84 and 03-137 (filed Sept. 13, 2013) at 10-13 ("MSI Comments"); Comments of Nokia Corporation, ET Docket Nos. 13-84 and 03-137 (filed Sept. 13, 2013) at 6, 9-10 ("Nokia Comments"); Comments of the Wi-Fi Alliance, ET Docket Nos. 13-84 and 03-137 (filed Sept. 13, 2013) at 7 ("Wi-Fi Alliance Comments").

5 *See* FNPRM at ¶ 211.

Commission.[6] Therefore, should it choose not to harmonize its exposure standard globally, the Commission should put forward convincing reasoning which overcomes the strong scientific record put forward by TIA and others. TIA believes that if the Commission looks to the science – not the rhetoric – as it stated it would as this proceeding was opened,[7] it must accept the broad consensus of experts and the science they have provided and harmonize its exposure standard with global norms.

B. SCIENTIFIC EVIDENCE ON THE RECORD VERIFIES THAT EXPOSURE STANDARDS FULLY PROTECT ALL POPULATIONS

As TIA – along with others on the record[8] – described in its comments, the current FCC, IEEE, and ICNIRP standards all have been determined by the expert groups that developed them and by independent expert panels to provide a substantial margin of safety—up to fifty-fold—for users of consumer RF devices, and therefore provide protection for all users, whether young, old or infirm.[9] Additionally, TIA noted in its comments that both the U.S. Food and Drug Administration and the World Health Organization ("WHO") have expressed confidence that the FCC and ICNIRP standards provide ample exposure limits for children.[10]

Despite the strong scientific case for this concept, the record contains scientifically-unsupported views which specifically advocate for the use of "metrics that are specific to the exposure children will experience,"[11] pointing to the WHO International Agency for Research on

---

6 *See, e.g.*, IEEE Comments at 2-7.

7 *See, e.g.*, FNPRM at ¶ 6.

8 *See, e.g.*, MMF Comments at 23-26.

9 *See* TIA Comments at 7-9.

10 *See Id.* at 9.

11 *See, e.g.*, Comments of American Academy of Pediatrics ("AAP"), ET Docket Nos. 13-84 and 03-137 (filed Sept. 13, 2013).

Cancer ("IARC") and National Cancer Institute as justification. As TIA and others have already explained, neither of these organizations' statements are conclusive or persuasive. We strongly urge the Commission to directly address and reject such calls for the use of population-specific standards based on the science underpinning the issue.

III. CONCLUSION

We thank the Commission for its public consultation and urge the careful consideration of the positions of the information and communications technology ("ICT") manufacturer and vendor community offered herein as the agency proceeds in its efforts to improve the device approval process.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: _____
Danielle Coffey
Vice President, Government Affairs

Brian Scarpelli
Senior Manager, Government Affairs

TELECOMMUNICATIONS INDUSTRY ASSOCIATION
1320 Court House Road
Suite 200
Arlington, VA 22201
(703) 907-7700

November 18, 2013