



March 3, 2014

Environmental Public Health
Washington State Department of Health
P.O. Box 47827
Olympia, WA 98504-7827

Re: Responding To Wi-Fi Safety Concerns in Our Schools

WSDOH document link:

http://www.doh.wa.gov/Portals/1/Documents/4100/WiFiSafety_Jan2014_DraftFinal.pdf

Dear Sir/Madam:

Although I am responding to the document through the public comment section, it is critically important the Department of Health and all school districts understand my professional background is specific to this important discussion. Residents concerned about wireless exposure have very valid concerns and Washington State has not been fully informed.

As Thermal Radiation Consultants(35 years) for a wide scope of industry, governments, medicine, medical education, fire services, insurers, military, etc, our work pertains to atoms and molecules of all matter above absolute zero. Absolute Zero is -273 deg. C or -459 deg. F.

Here are the first 2 lines of Wikipedia definition that can be seen at this link.

http://en.wikipedia.org/wiki/Thermal_radiation

“**Thermal radiation** is [electromagnetic radiation](#) generated by the [thermal motion](#) of [charged particles](#) in [matter](#). All matter with a [temperature](#) greater than [absolute zero](#) emits thermal radiation. When the temperature of the body is greater than absolute zero, interatomic collisions cause the [kinetic energy](#) of the atoms or molecules to change.”

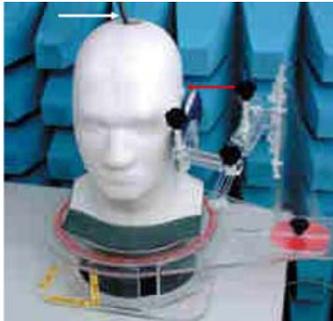
When wireless industry refers to the language using thermal or non thermal, it is misleading information and reflects the Specific Absorption Rate limits in the discussion. Non thermal is absolute zero, anything above -459 deg. F is thermal and the basis for **all** sciences.

It would and should alarm the WSDOH as well as school districts that even though scientific literature on wireless exposure is based on decades of studies, exposure codes admit causation and biological plausibility linking RF EMFs to adverse health effects was missing.

The Government of Canada's Health Canada uses Safety Code 6 for the limits of human exposure to RF EMFs and the same science standards used by the FCC and other international governing bodies. http://www.thermoguy.com/pdfs/Safety_Code_6.pdf

The strength of exposure codes in protecting the public is on page 9, paragraph 3 of Safety Code 6. **“The predominant health effect to be avoided is the unintentional stimulation of tissue as is the heat effect”** Intentional stimulation of tissue is medical imaging where people are put in an intended position of use and other parts of their body protected or workers in an RF EMF environments for short periods of time.

Health Canada, the FCC and other governing bodies have adopted the Specific Absorption Rate for the limits of human exposure. Here is a picture of a Sam Phantom Model used for testing.



All cellphone manufactures have to submit their phones for testing. The red arrow highlights the base of the antenna where a localized area of the skull is thought to be heated. The white arrow highlights the temperature probe in the hole in the test model's head where liquid is poured.

The same test is adopted for Wi-Fi and Smart Meters except 24/7 exposure has been deemed safe because the laptop and meter are not held against the head like a cell phone.

The 16 documents referred to on page 8 in the WSDOH based their references to harm on the same types of test models. When it is reported there are no peer reviewed studies showing harm, you can see why. This test dummy doesn't have any biological information, it is all based on whether water molecules heat and ridiculous, baseless science.

Health Canada's radiation professionals confirmed in our phone conversations that no cell phone antennas, Wi-Fi Routers or wireless smart meter grid was considered in the SAR test. Neither was any bio/electrical/chemical information associated with a human.

As a result, September 14, 2010 causation and biological plausibility linking the frequencies to adverse health effects was reported to provinces as well as Health Canada as jurisdictional authorities.

October 26, 2010 causation and biological plausibility was presented to Canadian Parliament's Standing Committee on Health by Canadian government certified electrical professionals at their request. Although electricity isn't a singular opinion, I was the reporting professional.

January, 2011 causation and biological plausibility linking the frequencies to adverse health effects was lectured in medical education for CME credits at the University of Central Florida. Here is a link to health education administration's letter on the accreditation and includes myself as adjunct faculty.

[http://www.thermoguy.com/pdfs/Integrative Health Forum on Medical Education Including Wireless Exposure.pdf](http://www.thermoguy.com/pdfs/Integrative_Health_Forum_on_Medical_Education_Including_Wireless_Exposure.pdf)

WSDOH medical professionals can contact the health education administrator and have candid discussion with medical peers.

During recent utility applications for wireless smart meters, I cross examined FortisBC utility experts at the BC Utilities Commission oral hearings about smart meter frequencies as well as the 2nd antenna inside the meter for Wi-Fi RF EMFs planned for inside each building.

FortisBC hired Exponent Inc to represent their Exponent Report on wireless safety. Engineer Mark Warren confirmed blanket coverage of 17,000 sq. Kms or 6564 sq miles to communicate with meters. Dr. Yakov Scholnikov confirmed frequency incompatibility with humans as well as the high speed oscillations of the frequencies 1.8 billion times per second for smart meters and 4.8 billion times per second for Wi-Fi at 2.4 Ghz.

Dr. William Bailey confirmed the voltages of cells, the many frequencies of the brain and body as well as the fact they were not included in their report on risk assessment or included in Safety Code 6. Dr. Bailey further confirmed frequencies triggered nerves in labs and that the nervous, hormonal and immune systems work together. (At lower frequencies, Safety Code 6 refers to electromagnetically inducing currents within biological tissue that can lead to nerve and muscle depolarization. Page 9, 3rd paragraph)

Dr. Bailey also confirmed that in order for RF EMFs to hurt people, they had to be exposed.

There are real reasons we wire the world, it is to confine frequencies to an insulated known conductor. That is why wireless requires extremely careful consideration as everything in the EMFs is effectively in an electrical circuit.

Here is a link to a Wi-Fi Risk Advisory which contains reports by industry dismissing any harm. The BC CDC and Chief Physicist Tony Muc make ridiculous statements about children in a classroom not being close enough to the laptop to be burned. Dr. Muc actually uses a stove element analogy that short distances from the laptop or device keep children safe. Both reports left out the routers bathing the classrooms and putting children as well as teachers inside an electrical circuit.

<http://thermoguy.com/wi-fi-health-risk-advisory-2/>

Cross examination of FortisBC experts confirmed blanket radiation and Mark Warren said engineers as well as others were not informed nor were they going to inform municipalities. As you can see by the test model of the SAR, the plastic head has no relevance to building codes but it is being used to bypass municipal jurisdictions including building code compliance. Mark Warren works for a utility and referred to electromagnetic induction as a hypothesis when it is how electricity is generated. The Exponent group also referred to bees and pollinators adapting to RF EMFs even though Scholnikov confirmed 900 Mhz going into the ground over 39 inches.

It was the FortisBC application for wireless that confirmed governments allowed utilities to bypass all regulatory process. No sciences, academia, medicine including medical education, insurers, engineers, architects, municipalities, lawyers, etc were consulted or informed.

Page 7, second paragraph of Safety Code 6 states **“The rate and distribution of RF energy absorption depends strongly on the frequency, intensity and orientation of the incident fields as well as the body size and its constitutive properties (dielectric constant and conductivity).”**

The router frequencies hitting children as well as teachers from head to toe at all different angles requires impossible calculations by engineers because every movement within the EMF changes the orientation to the EMFs.

Wi-Fi frequencies in schools will compromise the million plus students as well as building code compliance. The SAR is an admission currents are being induced into children, teachers, support staff and including a fetus. The RF EMFs associated with Wi-Fi at 2.4 Ghz will expand and collapse inside bodies, walls, roofs 4.8 billion times per second. That induces currents as well as the high speed polarization 180 degrees 4.8 billion times per second will rip anything apart and the peer reviewed science is called electricity.

The frequency bombardment will accelerate corrosion of buildings, infrastructure, fire separations and induce electrical charges in volatile areas that can cause explosions or fires. There is no margin of error. Here is a link showing you how 60 Hz which is considered extremely low frequencies can cause catastrophic electrical failure leading to fires, explosions, lost production, injury or loss of life. This is an industrial application for the lumber mill and their insurer. <http://thermoguy.com/wp-content/uploads/Electrical-Frequency-Problem-in-Lumber-Mill.pdf>

Pacemaker recipients are told to stay out of an EMF, the blanket coverage of areas including schools take the EMF to the recipients. <http://thermoguy.com/emf-pacemaker/>

WSDOH can look at the ridiculous science associated with a plastic head or body part and see the irrelevance to their objectives. Once your schools are compromised enough, there will be no occupancy and it will be enforced by fire and police. Putting over a million students in the EMF is electrocuting them slowly and that is qualified electrical language. The liability across the board including criminal liability will be excessive.

Qualifying the expenditure to hardwire schools can be substantiated as there are no other options. I look forward to any questions or challenges, this can NOT be dismissed.

I would advise contacting medical education administrator at the link where an open program can be discussed and questions can be answered in a recognized program.

Sincerely,

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