UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF
AIR AND RADIATION

C. K. Chou, Ph.D.
Co-Chairman, International Committee on Electromagnetic
Safety (ICES), Subcommittee-4
Motorola Incorporated, Florida Research Laboratory
8000 West Sunrise Boulevard
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Dear Dr. Chou:

This letter is in response to your proposal of a meeting with the federal Radiofrequency Interagency Work Group (RFIAWG) that would provide an opportunity for the IEEE ICES SC4 to give the Work Group an update of the revision of the C95.1-1999 standard.

We look forward to your presentation regarding the items listed in your proposed agenda, i.e., approaches of standard setting, literature review, rationale, basic restrictions and reference levels, and responses to the 14 issues raised by the RFIAWG in the June 17,1999, letter to Richard Tell.

The RFIAWG is particularly interested in how these 14 issues are to be treated in the revision process. In addition, the RFIAWG is submitting the following additional issues for the ICES consideration and response.

Issue: Exclusion of pinna

If the pinna is to be considered an extremity and subjected to exposure limit of 20 W/Kg over 10 g of tissue, then a clear rationale for treating the pinna as an extremity should be presented. This rationale should include biological properties of the pinna that qualifies it for this exclusion. If thermal effects would be the basis for the ICES standard, then the thermophysiology of the pinna and the skin, bone and other head tissues adjacent to the pinna should be discussed for all body sizes exposed.

Issue: Rationale for relaxation of current limits

Federal agencies, as well as the general public and the public health community, are very concerned about a relaxation of exposure guidelines that may result in increased exposure in the future. A rationale should be presented for relaxation of standards. The rationale should include a clear explanation of the impact of the exposures that may

result, i.e., the description of the exposures and the effects on critical tissues and organs. An explanation should be given as to why the current standard should be relaxed. The issue of safety factors should be also be addressed as part of the rationale for relaxation of current limits.

Issue: Sensitivity of different tissues

A clear explanation on how the revision has taken into account sensitivity of different tissues to temperature. Effects of acute and chronic exposure to elevated temperature should be adequately covered. We consider it appropriate to include as a part of the revised standard a description of the risk analysis that was done.

We ask that the RFIAWG be provided with a copy of the ICES response to all of the issues raised by the RFIAWG in advance of a meeting so that the Work Group members have sufficient time to study them and prepare for the meeting. We also request that you provide any other materials that you feel would be of value to the Work Group in preparing for a meeting.

Please be aware that comments and opinions that may be expressed by the RFIAWG participants are their personal comments and opinions and have not been reviewed and/or approved by their management or their agencies.

Sincerely,

Norbert N. Hankin
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Enclosure

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A 2013 presentation by the FCC shared the RFIAWG Charter.

Research Needs and Activities for Compliance Assessment

Robert D. Weller

Federal Communications Commission
Office of Engineering & Technology
Washington, DC USA

Approved Minutes – 17 January 2013 TC95 SC3/SC4 Meeting

ATTACHMENT 10

RFR Regulation in the U.S.A.

- FCC establishes and enforces RF exposure limits from regulated facilities and equipment, but FCC is not a health agency
- U.S. Health and Safety agencies are responsible for monitoring research and advising FCC on appropriate safety limits. FCC has regular meetings with experts from:
  - EPA
  - FDA
  - NIH
  - NIOSH
  - OSHA

Radiofrequency Interagency Work Group

Environmental Protection Agency
Federal Communications Commission
Food and Drug Administration
National Telecommunications and Information Administration
National Institutes of Health
National Institute of Occupational Safety and Health
Occupational Safety and Health Administration

Charter

The Radiofrequency Interagency Work Group (RFIAWG) is composed of Federal agencies which have regulatory or public health responsibility to evaluate or control the risk to public health from the use of specific devices or exposure to radiofrequency energy, or have responsibility for regulation and management of the use of the radiofrequency spectrum.

The purpose of the Radiofrequency Interagency Work Group is to provide a forum to discuss public health and regulatory issues pertaining to radiofrequency radiation, and to provide a basis for technical and policy coordination among member agencies in their approach to human exposure to radiofrequency energy. The RFIAWG may address the development of non-ionizing electromagnetic radiation exposure standards, guidance or guidelines to better understand the implications of exposure on human health and the environment, and prudent use of specific devices or technologies. The RFIAWG provides a forum for discussion of specific RF radiation-related activities and policies of the member Agencies that could affect other federal agencies represented in the Group. The Work Group also provides a forum to discuss developing issues, research, and to address the need for long-range federal strategy. It is intended that such coordination and discussion will lead to a more coordinated federal approach to potential health issues associated with existing and proposed technologies which use and produce human exposure to RF energy.

The RFIAWG was originally established by formal invitation to executives of the