FCC 2013 Docket 13-84 Revisited Following Court Order

Monday, November 2, 2026

The introduction (minus Maine Coalition to Stop Smart Meters information) and compilation of testimony to the FCC below is from Joel Moskowitz, Ph.D. at the U.C. Berkeley School of Public Health.

Wireless safety advocates filed a petition in the D.C. Circuit Court asking the Court to force the FCC to defend its 5-year delay in responding to the Court's ruling that the FCC must "explain how its RF exposure limits adequately protect against non-cancer health effects and address device testing, impacts to children, long-term exposure, and environmental impacts."

In response to this petition, on September 17, 2026, the FCC refreshed the proceeding #13-84 to obtain public input on the issues described above. More than 4,600 submissions have been filed in this docket since 2013.

The Maine Coalition to Stop Smart Meters filed extensive expert testimony in the original proceeding. We did not file in the current proceeding for two reasons: 1) This is a disingenuous solicitation by the FCC with intent to delay and obfuscate since they already have ample industry studies and several recent reviews to justify their decision and courts typically defer to the agency even if the opposing side has a differing opinion, and 2) we knew many experts and other organizations would be submitting comments, which were supposed to be scientific in nature.

We did however submit comments in a companion solicitation by the Department of Health & Human Services (Request for Information on Electromagnetic Fields (EMFs), Radiofrequency (RF) Radiation, and Wireless Radiation Exposure) which was more focused on health effects of RFR. Our testimony here featured the Smart Meter Health Effects survey we did back in 2011, the other expert testimony from our Maine PUC proceeding (that had been submitted in the original FCC docket) and a summary of 5 year litigation against Central Maine Power seeking reasonable accommodation under the ADA, Fair Housing Act and Section 504 of the Rehabilitation Act of 1973.

https://www.saferemr.com/2026/11/public-submissions-to-fcc-docket-13-84.html

Electromagnetic Radiation Safety
Website: https://www.saferemr.com/
Linkedin: https://www.linkedin.com/in/joel-moskowitz-7b817539/
Facebook: https://www.facebook.com/SaferEMR
X: @berkeleyprc

Electromagnetic Radiation Safety

Scientific & policy developments regarding the biological & health effects of electromagnetic radiation from cell phones, cell towers, Wi-Fi, Smart Meters, electric vehicles & other wireless technology, including 5G. Website curated by Joel Moskowitz, Ph.D., School of Public Health, University of California, Berkeley.

Monday, November 2, 2026

Public Submissions to FCC Docket #13-84 in 2026

Wireless safety advocates filed a petition in the D.C. Circuit Court asking the Court to force the FCC to defend its 5-year delay in responding to the Court's ruling that the FCC must "explain how its RF exposure limits adequately protect against non-cancer health effects and address device testing, impacts to children, long-term exposure, and environmental impacts."

For the history of this important legal case see "**A Historic Moment: FCC Is Forced to Defend Its Five-Year Delay in Responding to Landmark Wireless Radiation Ruling**."

In response to this petition, on September 17, 2026, the FCC refreshed the proceeding #13-84 to obtain public input on the issues described above. More than 4,600 submissions have been filed in this docket since 2013.

Selected submissions from 2013 through 2019 were summarized in earlier **posts** on this website. Unfortunately, my links to the earlier submissions no longer work as the FCC altered the original links.

This page contains links to key submissions to **Docket #13-84** during 2026. Thousands of scientific studies have been submitted to the docket and can now be downloaded from the FCC website.

The submissions are organized below under the following categories:

- Federal Agencies
- Expert Comments in Support of Stronger Regulations
- Expert Comments in Support of Current Regulations
- Consumer, Environmental and Safe Technology Organizations
- Health Professionals
- Industry Organizations and Associations
- Miscellaneous Other

Federal Agencies

FCC Office of Engineering & Technology
https://www.fcc.gov/ecfs/search/search-filings/filing/109170360523582

U.S. Department of Health & Human Services
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082659
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082443

Expert Comments in Support of Stronger Regulations

Frank Barnes, PhD
https://www.fcc.gov/ecfs/search/search-filings/filing/261100832224

Igor Belyaev, PhD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083415

Michael Bevington, PhD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083466

BioInitiative Reports (Cindy Sage. Co-Editor)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083157

Einar Flydal, PhD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082749

Lennart Hardell, MD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083386

Martha Reed Herbert, PhD, MD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082464

Paul Héroux, PhD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082407

ICEMS
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083384

International Commission on the Biological Effects of Electromagnetic Fields
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083602
https://www.fcc.gov/ecfs/search/search-filings/filing/105141360916768

International EMF Scientist Appeal
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083611

Olle Johansson, PhD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110080261

B. Blake Levitt, Henry C. Lai, Albert M. Manville
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083417

James C. Lin, PhD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082175

Erica Mallery-Blythe, MD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083527

Ronald L. Melnick, PhD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083572

Joel M. Moskowitz, PhD
https://www.fcc.gov/ecfs/search/search-filings/filing/261100832111

Else K. Nordhagen, Einar Flydal, Vibeke Frøkjær Jensen, Cornelia Waldmann-Selsam
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082559

Martin L. Pall, PhD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082489

Dimitris Panagopoulos, PhD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082980

Michael Peleg, MSc and Elihu Richter, MD, MPh
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082241

Oceania Radiofrequency Scientific Advisory Association
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083584
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083587
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083592
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083612

Steven G. Weller, PhD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082946

Expert Comments in Support of Current Regulations

Health Physics Society
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082643

IEEE International Committee on Electromagnetic Safety (ICES) (Richard Tell)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082452

National Council on Radiation Protection and Measurements (Congressional-chartered nonprofit)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082414

Consumer, Environmental, Health and Safe Technology Organizations

Alerte Phonegate (Dr. Marc Arazi)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083028

Bald Hill Pure and Clear Skies Association
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082813

California Brain Tumor Association (Kevin Mottus) 1200+ submissions of studies and EMF-injured person accounts
https://www.fcc.gov/ecfs/search/search-filings/results?q=(filers.name:(%22Kevin%20Mottus%22)+AND+proceedings.name:(%2213-84%22))

California For Safe Technology
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083162
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083111

Canadians for Safe Technology (Frank Clegg)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083548

Center for Electrosmog Prevention
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083099

Children's Health Defense
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083535
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082729
https://www.fcc.gov/ecfs/search/search-filings/filing/10528270768404

Connected Health Initiative
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083555

Consumers for Safe Cell Phones (Cynthia Franklin)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082045
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082053
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082051
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082054
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082058
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082054
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082055
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082059
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082057

Direct Energy Weapons Agency, Inc. (Mechael Wright-Hodges)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082799

Electrosensitive Society (Sheena Symington)

https://www.fcc.gov/ecfs/search/search-filings/filing/26110083565

Elektrosmog a zdravie civic association (Petra Bertová)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082596

EMF Check, Building Health LLC (Rex Funk)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082639

EMF Safety Network (Sidnee Cox)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083427

Environmental Health Sciences (Theodora Scarato) (1400+ submissions of studies)
https://www.fcc.gov/ecfs/search/search-filings/results?q=(filers.name:(%22Theodora%20Scarato%22)+AND+proceedings.name:(%2213-84%22))

Environmental Health Trust
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083490
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083107
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083681
https://www.fcc.gov/ecfs/search/search-filings/filing/1040171879879
https://www.fcc.gov/ecfs/search/search-filings/filing/101291988427134

Environmental Working Group
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083229

Families Advocating for Chemical and Tech Safety
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082775

Finnish Radiation Safety Association (Mikko Ahonen, PhD)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083470

Frog Safe, Inc.
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082792

Manu Waiata Restoration & Protection Society
https://www.fcc.gov/ecfs/search/search-filings/filing/26110078620
https://www.fcc.gov/ecfs/search/search-filings/filing/26110078479

Massachusetts Association for the Chemically Injured, Inc. (Jean A. Lemieux)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083452
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083721

The National Call for Safe Technology, Inc.
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082808

Pennsylvanians for Safe Technology
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083531
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083543

Physicians for Safe Technology (Dr. Cindy Russell)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083549

The Peoples Initiative Foundation
https://www.fcc.gov/ecfs/search/search-filings/filing/26110080690
https://www.fcc.gov/ecfs/search/search-filings/filing/26110080726
https://www.fcc.gov/ecfs/search/search-filings/filing/26110080727
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https://www.fcc.gov/ecfs/search/search-filings/filing/26110080802
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https://www.fcc.gov/ecfs/search/search-filings/filing/26110080804
https://www.fcc.gov/ecfs/search/search-filings/filing/26110080805
https://www.fcc.gov/ecfs/search/search-filings/filing/26110080806
https://www.fcc.gov/ecfs/search/search-filings/filing/26110080807
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082973

Rete 6V/mx6' - Atto Primo Salute Ambiente Cultura - A.M.I.C.A.
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083516

Rocky Mountains for Safe Technology (Susan Foster) - 138 submissions
https://www.fcc.gov/ecfs/search/search-filings/results?q=(filers.name:(%22Susan%20Foster%20Rocky%20Mountains%20for%20Safe%20Technology%22)+AND+submissiontype.description:(%22COMMENT%22))

Safe Technology Minnesota
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082196

Safe Tech Tucson
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083566

https://www.fcc.gov/ecfs/search/search-filings/filing/26110082535

Slowphone Brasil
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083079
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083089

Stop Smart Meters (Joshua Hart)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083083

Targeted Justice
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083135
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082471

Virginians for Safe Technology
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083617

Wired Broadband, Inc.
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083310

Wireless Radiation Education and Defense (WiRED)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083546

Health Professionals

Hillel Z. Baldwin, MD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082848

Len Ber, MD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082630

Mary Ellen Bluntzer, MD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110077333

David K. Calderwood, MD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082767

Brian R. Carvelas, MD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110077298

John Day, MD

https://www.fcc.gov/ecfs/search/search-filings/filing/26110077195

Dr. J.C. Elliott
https://www.fcc.gov/ecfs/search/search-filings/filing/26110079239

Sharon Goldberg, MD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083145

Dr. James Gulick
https://www.fcc.gov/ecfs/search/search-filings/filing/26110077175

Toril Jelter, MD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082824

R. Lyons, MD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083626

Anthony Mannarino MD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083196

Anne Merkel PhD ND
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082168

National Toxic Encephalopathy Foundation
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082803

Michelle Perro MD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082181

William Reed, MD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083418

Dr. John Ruhland
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083138

Robban Sica, MD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110077172

Carlos Sosa, MD
https://www.fcc.gov/ecfs/search/search-filings/filing/26110078022

Carol Taccetta, MD, FCAP
https://www.fcc.gov/ecfs/search/search-filings/filing/26110078988

https://www.fcc.gov/ecfs/search/search-filings/filing/26110078985
https://www.fcc.gov/ecfs/search/search-filings/filing/26110077689

Dr. Yael Stein
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083158

Dr. Juliet Williams
https://www.fcc.gov/ecfs/search/search-filings/filing/26110080555

Industry Associations

Association for Competitive Technology
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083554

Competitive Carriers Association
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083476

Competitive Enterprise Institute
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083492

Consumer Technology Association
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083520

CTIA
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083487

GSMA (Dr. Jack Rowley)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083438

Information Technology Industry Council
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082898

International Center for Law & Economics
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082986

Mobile & Wireless Forum
https://www.fcc.gov/ecfs/search/search-filings/filing/26110081980

Motorola Solutions
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083475

NCTA - The Internet & Television Association
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083480

Wireless Infrastructure Association and the Telecommunications Industry Association
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083519

Legal Professionals

Margaret Baird, Esq.
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083631

Robert J. Berg
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083187

Jean Rasch
https://www.fcc.gov/ecfs/search/search-filings/filing/26110080532

Gerald Steel, Professional Engineer, Registered Civil Engineer, Ret. Environmental Attorney
https://www.fcc.gov/ecfs/search/search-filings/filing/26110077781

Miscellaneous Other

Coalition of Mothers
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083282

Kelly Legacy Institute (Delonte D. Kelly)
https://www.fcc.gov/ecfs/search/search-filings/filing/26110077920

Alan Miller, PE
https://www.fcc.gov/ecfs/search/search-filings/filing/26110082459

Protection of the Educational Rights of Kids
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083288

Spectrum Cellular Management, LLC
https://www.fcc.gov/ecfs/search/search-filings/filing/26110083081