

January 11, 2016

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission 445 12th Street, S.W.  
Washington, D.C., 20554

Re: Informal Objection Under Section 5.95 to Application of Google, Inc., Application for Experimental License, File No. 0747-EX-PL-2015

Dear Ms. Dortch:

Maryland Smart Meter Awareness strongly urges the FCC to deny the request by Google for an Experimental License Permit (aka *Project Loon*) that would involve blanketing the entire US and its atmosphere in radiofrequency/microwave radiation.

Maryland Smart Meter Awareness (MSMA) is an organization dedicated to raising awareness about the bioeffects of wireless radiation as well as other problems associated with wireless smart meters and to educating the public about the harms of many other wireless devices and technologies.

MSMA recognizes there are real benefits to be gained from connectivity in the remotest areas of the world thus allowing for opportunities to overcome poverty and inadequate health care. But it is our belief that such aid can be delivered through safer means. Connectivity that is protective of health and the environment **and** that delivers necessary tools to all can be achieved safely through cable if we care enough to insist on it. In light of all the following concerns, MSMA urges the FCC to **deny** Google's proposal regarding Project Loon.

### **The Science:**

The international biomedical research community has issued dire warnings about the biological effects of radiofrequency/microwave radiation, aka wireless radiation. On May 11, 2015, over 200 international scientists issued an appeal to the United Nations and all member states calling for greater protection from non-ionizing electric magnetic field exposure. <https://www.emfscientist.org> The appeal states: *"Numerous recent scientific publications have shown that EMF affects living organisms at levels well below most international and national guidelines. Effects include increased cancer risk, cellular stress, increase in harmful free radicals, genetic damages, structural and functional changes of the reproductive system, learning and memory deficits, neurological disorders, and negative impacts on general well-being in humans. Damage goes well beyond the human race as there is growing evidence of harmful effects to both plant and animal life."*

Although the science is overwhelming, we point you to just one of thousands of resources available regarding the health effects of wireless radiation. Please see

- The annotated bibliography of the following document (pages 3-6) by Dr. Ronald Powell PhD, Applied Physics, Harvard University.  
<http://www.scribd.com/doc/289778053/Message-to-Schools-and-Colleges-about-Wireless-Devices-and-Health> and
- One of many lists of international governments and organizations seeking more conservative RF safety limits and exposures to the public.  
[http://www.cellphonetaskforce.org/?page\\_id=128](http://www.cellphonetaskforce.org/?page_id=128)

### Other Concerns:

1. *Project Loon* would be a violation of the UN Declaration of Human Rights, given the increasing number of organizations, governments, scientists, etc. that have issued warnings regarding the safety of radiofrequency/microwave radiation.  
<http://ehtrust.org/cell-phones-radiation-3/international-policy-actions-on-wireless/>
2. *Project Loon* would be in violation of UN Convention on the Rights of the Child, given the increasing number of medical organizations, governments, healthcare professionals, scientists, etc. around the world that have issued dire warnings regarding the safety of radiofrequency/microwave radiation around children.  
[www.ehtrust.org](http://www.ehtrust.org)
3. *Project Loon* would directly violate UN Convention on the Rights of Persons with Disabilities, Article 3, which calls for people with disabilities to have “full and effective participation and inclusion in society.” The growing number of people suffering from Electromagnetic Hypersensitivity (EHS), who in many cases are already refugees in their own country, will have nowhere left to flee to. For further information regarding EHS, Please see  
[http://www.cellphonetaskforce.org/?page\\_id=244](http://www.cellphonetaskforce.org/?page_id=244)
4. The approval of *Project Loon* would violate the UN Rio Declaration on Environment and Development, Principle No. 15, The Precautionary Approach, which states: “In order to protect the environment, the precautionary approach shall be widely applied by States.... Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.”  
<http://www.gdrc.org/u-gov/precaution-7.html>
5. *Project Loon* would also be harmful to wildlife. Please see *Letter from the US Department of the Interior* regarding the current FCC standards being outdated and not sufficiently protective of wildlife.  
[http://www.ntia.doc.gov/files/ntia/us\\_doi\\_comments.pdf](http://www.ntia.doc.gov/files/ntia/us_doi_comments.pdf) For an overview of the research on the impact wireless on nature, please also see *Assault on Nature* at [http://www.cellphonetaskforce.org/?page\\_id=34](http://www.cellphonetaskforce.org/?page_id=34)

6. *Project Loon* would potentially destroy ozone and negatively impact climate change as a result of soot emissions from thousands of rockets.
7. The approval of *Project Loon* before sufficient research has been conducted on the potential harms of such an undertaking, would fly directly in the face of the UN General Assembly Resolution adopted by the General Assembly July 2012, Article 275 which urges nations to strengthen research and technology assessment "...especially in view of the rapid development and possible deployment of new technologies that may also have unintended negative impacts, in particular on biodiversity and health, or other unforeseen consequences."
8. The radiation from *Project Loon* will potentially cause interference with necessary aircraft communications and controls and may be strong enough (due to the proximity of aircrafts to the transmitters) to have serious long and short-term bioeffects on flight crews and passengers.
9. There will be no way that insurance will be able to cover potential events resulting from this technology as the extent of the harms will be too far reaching. Please see <http://stopsmartmeters.org.uk/insurance-firm-swiss-re-warns-of-large-losses-from-unforeseen-health-claims-due-to-wireless-technologies/> Insurance Swiss Re warns of large losses from "unforeseen consequences" of wireless technologies. The company categorizes the impact on health claims from electromagnetic fields as "high."

In light of all of the above, it does not seem prudent to WiFi our planet, even on an experimental basis. In the opinion of Maryland Smart Meter Awareness, Google's *Project Loon* should be denied until such a program is proven safe for the planet and all life.

Sincerely,

Kate Kheel, Director MSMA

Ruthie Eisenberg, Treasurer MSMA

Rebecca Diener, Public Relations MSMA

Jonathan Libber, Counsel to MSMA

[www.marylandsmartmeterawareness.org](http://www.marylandsmartmeterawareness.org)

Dr. Anita Moore, Federal Level Action Group (FLAG), a subsidiary of MSMA working on the national level

Theodora Scarato LCSW-C, Parents for Safe Technology

[www.parentsforsafetechnology.org](http://www.parentsforsafetechnology.org)