

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of:)	
)	
Modernizing the Commission’s National)	WT Docket No. 25-217
Environmental Policy Act Rules)	
)	
Petition for Rulemaking on the)	
Commission’s Rules Part 1, Subpart 1,)	RM 12003
Implementing NEPA)	

**COMMENTS OF WIRED BROADBAND, INC.
ON BEHALF OF AMERICANS INJURED AND DISABLED
FROM ELECTROMAGNETIC RADIATION
(ELECTROMAGNETIC RADIATION SYNDROME – EMR-S)**

September 18, 2025

Submitted by:
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FILING PARTIES

The parties listed in Appendix A (attached hereto and incorporated herein by this reference) collectively constitute the “Filing Parties,” have granted permission to submit these Comments on their behalf, and join together to submit these Comments.

Executive Summary

Wired Broadband, Inc., on behalf of Americans injured or disabled by electromagnetic radiation, and the Filing Parties set forth in Appendix A, respectfully submit these comments. The Filing Parties and coalition partner groups have a reach of about 1.35 million people across the country. We advocate for the safe deployment of communications infrastructure.

With respect to wireless facilities. FCC should be expanding and strengthening its review procedures under NEPA, not reducing them. Historically, FCC has been focused on surface features and physical construction considerations. This rulemaking is a good example – the Commission is reviewing NEPA without considering RF (fn 153). Finally, regarding satellites the Commission should be enhancing its environmental review by removing categorical exclusions, not expanding them.

The following comments are organized by paragraph numbers in the NPRM¹ (not necessarily in order of priority).

¶12

47 CFR 1.1307(b) sets out certain radiofrequency-related actions that require an environmental assessment. The NPRM summarizes it as any action that causes “human exposure to radiofrequency emissions that exceed the limits in the Commission’s rules.” (fn 34). FCC should add to its list of actions that require an environmental assessment: exposure by plants, animals, and microbes, whether wild or farmed, to radiofrequency radiation that exceeds the limits in the Commission’s rules. The FCC does not do this because it has never, ever, promulgated rules that are protective of nonhuman life. However, the FCC should take note that humans are dependent on plants and animals for, among other things, food, clean water, and the oxygen we breathe. The FCC’s failure to issue rules protective of all biological life threatens the well-being and prosperity of all Americans.

¶18

We believe there is a legitimate reliance interest in repealing the NEPA rules, although not in the way the FCC thinks. The FCC has preempted local governments from regulating RF emissions and exposure. Local governments and the public rely upon the FCC to fulfill its regulatory role. As set out in *Murphy v. NCAA*,² the federal government cannot preempt and prohibit the states from carrying out a regulatory role while at the same time avoiding federal

¹ <https://www.fcc.gov/document/fcc-aims-overhaul-nepa-process>

² *Murphy v. NCAA* (US, 2018) https://www.supremecourt.gov/opinions/17pdf/16-476_dbfi.pdf

regulation. This is effectively what the FCC is doing with radiofrequency. It has set its current limits so high so as to be meaningless in the vast majority of cases. The Institute for Building Biology recommends maximum exposure peak levels of 10 μW per square meter.³ The FCC's limits are 10 million μW per square meter, averaged over 30 minutes, which means on an apples-to-apples basis, peak levels would need to be around 50 million μW per square meter to exceed the FCC threshold. Imagine if the speed limit on our roadways was 50,000,000 mph (or 10,000,000 mph averaged over 30 minutes of travel). While theoretically speed limits would exist, they would be so high so as to not effectively limit the conduct of any drivers on the road.

¶21, 23, 24,25, 34

The following should be considered major federal actions (MFA's): granting of any license under Title III, any spectrum auction or spectrum allocation that may result in RF densification, and any geographic area license. The FCC does exercise substantial "control [of] the outcome of the project" when granting geographic area licenses; for example it mandates minimum buildout and coverage requirements and regulates the RF emissions of those projects. Any action that results in a substantial densification of radiofrequency across a geographic area (for example across a metropolitan area) should be deemed an MFA. The fact that the Commission may not know the exact address/location/GPS coordinates of a particular wireless facility does not change the fact that its licensure will have a material adverse and foreseeable impact across a wide geographic area. Even without specific buildout commitments, it is reasonably foreseeable to the FCC that the carrier, upon purchasing costly spectrum and acquiring a license, intends to build wireless facilities pursuant to such licensure. MFA should also include the authorization of spectrum for unlicensed use, as it represents the last regulatory step in making such spectrum available.

¶22

Federal dollars used for recipients' operating expenses should be considered an MFA if they are significant. The statute excludes "no or minimal federal funding," not substantial federal funding for the purpose of operating expenses. Particularly given that cash is fungible, any substantial federal funding would reduce operating expenses thereby allowing the recipient to, in turn, spend more on capital expenditures. Therefore having the same effect as providing substantial federal funding for capital expenditures.

³ <https://safelivingtechnologies.com/content/Education/EMF-Exposure-Guidelines-For-Sleeping-Areas.pdf>

¶29, fn 95 Licensing spectrum on a nationwide basis for space launches or satellites is an MFA, as is the launch itself. It is not only us who think so; the Commission should consider the two GAO reports⁴ described below (see comments below at ¶64).

¶33

FCC should not categorically exclude space operations; they are not extraterritorial activities. The NPRM misconstrues the statutory text by citing only a portion of the statutory exclusion, which reads in its entirety:

(vi) extraterritorial activities or decisions, which means agency activities or decisions with effects located entirely outside of the jurisdiction of the United States⁵

- 1) First, the launch of satellites is not an extraterritorial activity and the decision to launch is not an extraterritorial decision, i.e. both the activity and the decision to launch, license, and reenter, occur within the United States.
- 2) Second, the word “entirely” should be read synonymously as “exclusively.” Most of the satellites launched today are mega-constellations in non-geostationary orbit (NGSO), meaning that they migrate across the sky and across the planet. No satellite operator can say that the effect of its satellites are entirely and exclusively outside the United States territory.
- 3) Third, the FCC is interpreting the word “jurisdiction” incorrectly; in this situation, it should not be read as the physical borders of the United States, but rather under the responsibility and accountability of the United States government. As the FCC has admitted previously, the United States government, under its treaty obligations, is responsible and holds liability for satellites launched by US companies and their effects around the planet.⁶
- 4) Fourth, even if a satellite operator could show that certain satellites will remain in orbit exclusively outside the territorial footprint of the United States, they cannot and have not shown that the effects of the satellites do not impact the United States. For example, United States ecosystems and agriculture may be dependent on birds, bats, and insects

⁴ GAO noted that “because large constellations of satellites did not exist [in 1986], FCC’s experience up to that point would not have involved the consideration of this technology.” Satellite Licensing: FCC Should Reexamine Its Environmental Review Process for Large Constellations of Satellites (November 2022)

<https://www.gao.gov/products/gao-23-105005>; Large Constellations of Satellites: Mitigating Environmental and Other Effects (September 2022) <https://www.gao.gov/products/gao-22-105166>.

⁵ 42 USC 4336e(10)(B)(vi), as amended June 3, 2023.

<https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title42-section4336e&num=0&edition=prelim>

⁶ In 2018, the FCC recognized that under international treaties the US government is liable for damages that US satellites cause abroad, including falling debris. See paragraphs 76-80.

<https://www.fcc.gov/document/fcc-launches-review-rulesmitigate-orbital-space-debris-0>

In 2020, the FCC decided not to require satellite companies to carry insurance (paragraph 135). FCC has not required satellite companies to indemnify the US government (paragraph 136) for liability (paragraph 177), and acknowledged that: “[T]hose costs would be borne by U.S. taxpayers.” (paragraph 178)

<https://www.fcc.gov/document/fcc-updates-orbitaldebris-mitigation-rules-new-space-age-0>

that migrate from Latin America into the southern United States. Disruptions to these migration patterns and US ecosystems are effects within the physical footprint of the United States (i.e. even under the FCC's incorrect interpretation of the word "jurisdiction").

- 5) Fifth, the FCC needs to consider United States treaty obligations when considering impacts outside the territorial land of the United States.⁷

¶139

Any tower construction may yet have "a significant environmental impact" should be considered an NHPA undertaking. We agree with the 2006 CTIA Decision, 466 F.3d at 115, that makes FCC's approval authority under NEPA for tower construction an undertaking.

¶140

Reviews under NEPA and NHPA are very different. Even in instances where NEPA may not be applicable, although NEPA should be applicable in all instances of wireless facility deployment, any categorical exclusions under NEPA do not and should not negate NHPA review.

NEPA involves assessments of the environment, e.g., if construction of a wireless facility will be in a wetlands area, a floodplain or in the migratory path of endangered species. NHPA involves preserving and not disturbing cultural artifacts, and the aesthetics of an historic district or structure that would detract from the characteristics that would make it eligible for inclusion in the National Register of Historic Places. Under § 800.5(a)(1) of the Section 106 regulations:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association... Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

Adverse effects include a "change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance" [§ 800.5(a)(2)(iv)] and the "introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features" [§ 800.5(a)(2)(v)].

"Section 1.1307(a)(4) requires that prior to initiation of construction of a communications tower facility . . . it must be determined whether the proposed tower facility would affect

⁷ Id

properties listed or eligible for listing on the National Register Historic Places. 47 CFR § 1.1307(a)(4).” (FCC letter to CityBridge in NYC 4-20-23)

Notwithstanding the differences, NEPA regulations should remain intact.

¶41

Same response as for ¶40.

¶45

The Commission’s rules creating an NHPA undertaking should remain intact. The D.C. Circuit affirmance in the CTIA Decision that the Commission’s ASR rules create an NHPA undertaking remain intact.

¶47

FCC should maintain notification and public participation – and not reduce any current avenue. Doing so would be the opposite of transparency and good governance

¶51,66

As previously discussed, FCC should not delete or remove any items from its list of actions that require an environmental assessment, although it should add the additional actions set out above (see comments at ¶21 et seq). Furthermore, FCC should not delete the catchall provisions in 1.1307 (c) and (d). These catchall provisions have been crucial for identifying impacts that the FCC either did not foresee, or could not have been foreseen at the time the categorical exclusions were issued, such as satellite mega-constellations (see ¶64 infra). Unfortunately, this is likely the reason that FCC wants to eliminate them – to avoid the public identifying failings in the FCC’s assessments.⁸

¶fn 153

In 1996, the FCC promulgated its RF exposure limits under NEPA.⁹ The current NPRM illustrates the absurdity of FCC’s approach to radiofrequency exposures. The Commission is embarking on a rewrite of its NEPA rules, without addressing radiofrequency exposures. Arguably, the Commission’s greatest responsibility, of all environmental effects, is the regulation of radiofrequency emissions and exposures. When it comes to surface features,

⁸ See Viasat and Dark Sky as examples were these as examples were these provisions have been exercised, although the FCC did prevail in court.

⁹ Guidelines for Evaluating the Effects of Radiofrequency Radiation: Report and Order, ET docket 93-326 https://transition.fcc.gov/Bureaus/Engineering_Technology/Orders/1996/fcc96326.pdf

FCC is not fundamentally a land management agency. When it comes to space launches, it is not fundamentally an aviation or aeronautics agency. It is however the spectrum manager for radiofrequency across the entire private sector. And yet this is the one topic which the FCC is excluding from its NEPA review.

While the DC Circuit has ruled that the FCC can break its rulemaking into separate proceedings¹⁰, (a) this does not mean the FCC can ignore the radiofrequency exposure proceedings in dockets 03-137, 13-84, and 19-226, as it has done now for over four years and the concomitant court order; (b) the separate proceedings must occur reasonably close in time to each other (i.e. within a few months or a year), not many years apart,¹¹ and (c) the doctrine of separate proceedings assumes that the proceedings are reasonably separated; i.e. FCC asserts that permitting is separate from exposure. However, the current NPRM is expressly about NEPA, not a separate topic from radiofrequency emissions and exposures. We urge the FCC to promptly address the 2021 remand issued by the DC Circuit in *Environmental Health Trust, et al. v. FCC*.¹²

¶154

The approach we set out in the comments is consistent with the purpose of the amended NEPA, which reads (emphasis added):

The purposes of this Act are: To declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and **stimulate the health and welfare of man**; to enrich the understanding of the ecological systems and natural resources important to the Nation; and to establish a Council on Environmental Quality.¹³

Our approach is also consistent with the purposes of the Communications Act, which includes (emphasis added):

“the purpose of **promoting safety of life and property** through the use of wire and radio communications”¹⁴

and the Communications Act’s savings clause, which preserves all other remedies at law:

¹⁰ *Children's Health Defense, et al., v. FCC* (2022, DC Circuit), at fn 4

<https://media.cadc.uscourts.gov/opinions/docs/2022/02/21-1075-1934754.pdf>

¹¹ *Transp. Div. of the Int’l Ass’n of Sheet Metal Workers v. Fed. R.R. Admin.*, 10 F.4th 869, 875 (D.C. Cir. 2021)

¹² <https://media.cadc.uscourts.gov/opinions/docs/2021/08/20-1025-1910111.pdf>

¹³ 42 USC 4321

¹⁴ 47 USC 151

Nothing in this chapter contained shall in any way abridge or alter the remedies now existing at common law or by statute, but the provisions of this chapter are in addition to such remedies.

Unfortunately, the FCC, courts, and industry have over-interpreted FCC RF regulatory limits (promulgated under NEPA) by incorrectly treating them as regulatory safe harbors and asserting that they are preemptive of other remedies existing at common law or by statute, including without limitation the Americans with Disabilities Act and the Rehabilitation Act of 1973.¹⁵

¶55 FCC should not create any additional categorical exclusions related to communications towers or wireless facilities, or small wireless facilities and DAS. Its prior attempt to do so with the Small Cell Order was struck down by the DC Circuit¹⁶ for good reason – doing so is not in the public interest.

¶56, 67

Even if FCC finds that it is not generally “required to undertake new scientific or technical research”, it must make use of existing data already in its possession. It cannot willfully ignore evidence it is well aware of, such as that submitted in the dockets 03-137, 13-84, and 19-226.

¶64

While the *Dark Sky* court ruled that the FCC’s decision was compliant with the Administrative Procedures Act, that does not mean that the licensure of NGSO’s do not have dramatic and potentially irreparable environmental effects, including effects on human health. The court ruled narrowly on whether FCC determinations met the APA standard when considering light pollution and atmospheric effects from rocket launch and reentry. Satellites wreak other kinds of pollution, including particulate pollution, radiofrequency emissions, and impacts on the magnetosphere of the planet¹⁷ that may have biological effects across the planet. As the

¹⁵ See attached [EMS Disability filing]

¹⁶ *Keetoowah, et al. v. FCC* (DC Circuit, 2019)

<https://media.cadc.uscourts.gov/opinions/docs/2019/08/18-1129-1801375.pdf>

¹⁷ Earth’s Magnetosphere: Protecting Our Planet from Harmful Space Energy

<https://science.nasa.gov/science-research/earth-science/earths-magnetosphere-protecting-our-planet-from-harmful-space-energy/>

Debris from burning satellites could be affecting Earth's magnetic field, space.com, 3/15/24

<https://www.space.com/satellites-re-entering-magnetosphere-effects-study>

Potential Perturbation of the Ionosphere by Megaconstellations and Corresponding Artificial Re-entry Plasma Dust

<https://arxiv.org/abs/2312.09329>

Commission points out, in *Viasat, et al.* petitioners raise these issues and were found to lack standing (fn 180). This does not mean the FCC acted reasonably in granting those licenses, nor does it vitiate the need for environmental review. The FCC’s current categorical exclusions were issued in 1986,¹⁸ which as the GAO pointed out in two separate reports, are no longer defensible, given that NGSO mega-constellations did not even exist at the time that the categorical exclusions were issued.^{19,20} In fact, the FCC wrote at the time, without evidence, “Based on the Commission’s experience, we have determined that the telecommunications industry does not generally raise environmental concerns.”²¹ Unfortunately this mentality still permeates the Commission, which is a belief system not based on evidence or on the 2021 court decision in *Environmental Health Trust v. FCC et al.*

Finally, the existing maximum permissible exposure limits do not account for the cumulative and long-term effects of satellite-related radiofrequency exposures, not only on individual organisms (such as a single person or a single body part of a human), but on planetary-wide effects that impact entire ecosystems, upon which humans depend for survival. Furthermore, the MPE limits are intended to assess the impact of RF exposure from all sources, not solely from a single source (i.e., exposure not just from a given source, but the cumulative and aggregate total from all sources emitting simultaneously), which the Commission should consider but fails to do.

¶170

The Commission should not adopt NTIA’s or any other federal agency’s categorical exclusions with respect to radiofrequency emissions or exposure. NTIA for example defers to the FCC on this topic; FCC cannot abdicate its NEPA responsibilities for radiofrequency (fn 193).

¶186

Scientists discover strong, unexpected link between Earth's magnetic field and oxygen levels, life science.com, 6/13/25

<https://www.livescience.com/planet-earth/geology/scientists-discover-strong-unexpected-link-between-earths-magnetic-field-and-oxygen-levels>

The FCC should consider not only the impact of particulate and reentry dust on the magnetosphere, but also geostationary and non-geostationary satellites themselves.

¹⁸ Federal Register at page 14999

<https://www.govinfo.gov/content/pkg/FR-1986-04-22/pdf/FR-1986-04-22.pdf>

¹⁹ GAO noted that “because large constellations of satellites did not exist [in 1986], FCC’s experience up to that point would not have involved the consideration of this technology.” Satellite Licensing: FCC Should Reexamine Its Environmental Review Process for Large Constellations of Satellites (November 2022)

<https://www.gao.gov/products/gao-23-105005>

²⁰ Large Constellations of Satellites: Mitigating Environmental and Other Effects (September 2022)

<https://www.gao.gov/products/gao-22-105166>

²¹ fn 18, supra.

All existing opportunities for public notice should be preserved, in the interest of transparency and good governance.

¶101

We do not think such emergency procedures are necessary because carriers are able to provision service without them. However, in the event that the Commission does adopt emergency procedures, such authorizations should be time-limited and expire promptly upon the cessation of the emergency, so as not to allow applicants to take advantage of such emergency powers for conducting ordinary operations.

¶104

The Commission is right to identify that diluting its environmental rules and procedures will knowingly and foreseeably cause harm to the environment, humans, and agriculture. The Commission must quantify the harms, and the cost of these harms, that will inevitably result from the actions contemplated in this NPRM. We attach 2 compendia of information to aid in the Commission's quantification:

- 1) Filing made previously to HHS documenting electromagnetic radiation disability, and many of the costs to people in society from this disability. FCC's action (and inaction) under this NPRM will knowingly and foreseeably harm this population, as well as other vulnerable populations, such as children, pregnant women, and a range of other Americans.
- 2) Compendium of science documenting biological impacts of radiofrequency radiation.

Attachments:

Appendix A – Filing Parties

A: Fact sheet on satellite proliferation, prepared by Environmental Health Trust

B: HHS filing

C: Science compendium

**On behalf of Americans Injured and Disabled
from Electromagnetic Radiation and the Filing Parties**

Respectfully Submitted,

A handwritten signature in black ink that reads "Odette J. Wilkens". The signature is written in a cursive style with a large initial 'O' and 'W'.

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APPENDIX A

The parties listed below collectively constitute the “Filing Parties,” have granted permission to submit these Comments on their behalf, and join together to submit these Comments.

National Organizations – Filing Parties	
The National Call for Safe Technology, Odette J. Wilkens, Chair & General Counsel, NY	
[Stand for Health Freedom, Leah Wilson, Co-Founder and Executive Director, Naples, FL]	
[The Weston A. Price Foundation, Sally Morell Fallon, President, Washington, D.C.]	
[Alliance for Natural Health, Robert Verkerk, PhD, Executive and Scientific Director, Alexandria, VA]	
[National Health Federal, Scott Tips, President, Mossyrock, WA]	

U.S. State	Filing Parties
AR - Arkansas	PACTS International, Ken Stroud, Advisory Board Member/Technical Director, with Havana Syndrome, Little Rock, AR
AZ - Arizona	Arizonans for Safe Technology
	EMF Wellness Tucson, Lisa Smith, PhD, Tucson, AZ
	Safe Tech Tucson, Tucson, AZ
	Floris R. Freshman, published artist and composer, with EMR-S, Scottsdale, AZ Susan Molloy, M.A., Snowflake, AZ
	Melissa Hayes, M.S. with EMR-S, Oro Valley, AZ, Oak Haven Wellness, LLC
	Karen Langran, Peoria, AZ Renée Neumann, Tucson / Green Valley, AZ
CA – California	EMF Safety Network, Sidnee Cox, Co-director, Windsor, CA
	Fiber First LA, Charlene Hopey, Topanga, CA
	Malibu for Safe Tech, Lonnie Gordon, Executive Director, Malibu, CA
	Napa Neighborhood for Safe Technology, Amy Martenson, Napa, CA
	Safe Tech International, Sara Aminoff, Union City, CA
	5G Free California, Julie Levine, with EMR-S, Topanga, CA,
	California Brain Tumor Association, Ellen Marks, Director, Indian Wells, CA
	Sustainability Management Consulting, Angela Casler, Chico, CA
	Eagle Forum of California, Orlean Koehle, CEO, Santa Rosa, CA
	Brenda Shafer, with EMR-S, CA Gene Wagenbreth, Topanga, CA Margaret Holt Baird, Esq, with EMR-S, San Diego, CA

	Raymond Michael LeVesque, RayGuardProtect.com, National Health Federation Board Member, Clear Lake Riviera, CA
CO - Colorado	Coloradans for Safe Technology, Andrea Mercier (mother of a severely disabled child who is adversely impacted various forms of non-ionizing radiation), Colorado Springs, CO
	Coloradans for Safe Technology, Nancy VanDover, DVM, OMD, Dipl Acup, disabled by EMR, CO
	La Plata for Safe Technology, Ingrid Iverson, with EMR-S, La Plata County, CO
	Longmont for Safe Technology, Doe Kelly, Co-Founder, with EMR-S, Longmont, CO
	Deborah Shisler, with EMR-S, CO Virginia Farver, Fort Collins, CO
FL - Florida	Kay Fitt, Palm Harbor, FL; Susan Lee, Miami, FL Shirley Denton Jackson, with EMR-S, unexpected early retirement from School District of Palm Beach County, FL - Research Project Manager and Safe Schools Coordinator - due to EMR-S, North Palm Beach, Florida
IL - Illinois	Safer Cell Phone and Wi-Fi Project, Marne Glaser, Chicago, IL
LA - Louisiana	Southern EMF Radiation Solutions, Shari Champagne, with EMR-S, Houme, LA
MA – Massachusetts	Massachusetts for Safe Technology, Cecelia Doucette, Director, Ashland, MA
	Pittsfield Cell Tower Injured & Concerned Citizens (injured with EMR-S), Pittsfield, MA
	Safer Siting 01240, Lenox, MA
	Safe Tech International, Patricia Burke, journalist, with EMR-S, Millis, MA
	Sustainable Upton, Laurie Wodin, Co-Administrator, with EMR-S, Upton, MA
	Last Tree Laws (.com), Kirstin Beatty, with EMR-S, Director, Holyoke, MA
	The Leto Foundation, Westborough, MA
	Alison McDonough, with EMR-S, Canton, MA Janet FitzGerald, M.S., CCC-SLP Rowley, MA, member of Massachusetts for Safe Technology Anna Nelson, with EMR-S, Pittsfield, MA
MD - Maryland	Safe Tech International, Kate Kheel, Taneytown, MD
	Katherine Katzin, Takoma Park, MD
ME - Maine	Global Union Against Radiation Deployment from Space, Bowdoinham, ME
	Maine Coalition to Stop Smart Meters, Richmond, ME
	Janet Drew, retired Registered Nurse, York, ME

	Jen Goddard, Board Certified Doctor of Natural Health, Thriving Proof Holistic Health Practice, and 2025 United States of America Mrs. Maine Pageant, Brewer, ME
MI - Michigan	
MN - Minnesota	Safe Tech Minnesota, Leo Cashman, Petra Brokken, St. Paul, MN
MO - Missouri	Loraine Uebele, FACHE, Kansas City, MO Marty Freyer, Mexico, MO David P. Klug, Kansas City, MO
NC - North Carolina	Sharon Behn, Arden, NC Susan Marlan, Asheville, NC Nicole Stallings, with EMR-S, Black Mountain, NC
NE - Nebraska	Tammy Lee, with EMR-S, Lincoln, NE Linda Becker, Lincoln, NE
NH - New Hampshire	New Hampshire for Safe Technology, Deb Hodgdon with EMR-S, Stratham, NH
NJ - New Jersey	Lisa Allen, Plainfield, NJ Diane Grossi with EMR-S, East Hanover, New Jersey
NM - New Mexico	Lori Bagley, concerned individual with EMR-S, Albuquerque, NM
NY - New York	New Yorkers 4 Wired Tech, New York, NY
	New York City Alliance for Safe Technology, New York, NY
	Safe Tech Westchester, Ruth F. Moss, Westchester, NY
	Amy Harlib, Concerned Citizen, New York, NY Fred P. Sinclair, Jr., Alfred, NY Kate Reese Hurd, with EMR-S, Philmont, NY Gabriela Munoz, with EMR-S, Carmel, NY Stephanie Stewart, LaGrangeville, NY
OH - Ohio	Craig McDowell, veteran, Rocky River, OH Erin McDowell, Registered Nurse, with EMR-S, Rocky River, OH, Southwestern Ohio for Responsible Technology (SWORT) Jennifer Manzler, Certified Health & Wellness Coach, Cincinnati, OH, SWORT Sean Polacik, Automation Control Systems Technician, OH Cristina Shonk, Cincinnati, OH
OR - Oregon	Oregon for Safer Technology, Ashland, OR Kelly Marcotulli with EMR-S, Ashland, OR The Soft Lights Foundation, Mark Baker, President, Beaverton, OR
PA - Pennsylvania	Pennsylvanians for Safe Technology, Donna DeSanto Ott PT DPT MS FMCHC, Founder & President, PA
	Southwest Pennsylvania for Safe Technology, Mount Pleasant, PA, Susan Jennings, MPA, BA, Founder (son has EMR-S)
	Jan Kiefer, Scottdale, PA
RI - Rhode Island	Rhode Island 4 Safe Tech, Sheila Resseger, M.A., Co-Founder, Cranston, RI
TN - Tennessee	Janet Taché, Hohenwald, TN

UT - Utah	Rosemarie Russell, member of The Women's State Legislative Council of Utah, Hurricane, UT
VA - Virginia	Virginians for Safe Technology, Jenny DeMarco, Communications Director, and Mary Bauer, retired radio frequency engineer, Fredericksburg, VA
	Charles Frohman, M.Ed, HIA, lobbyist, National Health Federation, Williamsburg, VA
	Linda M. Cifelli, retired Registered Nurse, Williamsburg, VA Grace Hilbert, with EMR-S, Annandale, VA
VT - Vermont	Martine Victor, VT
WI - Wisconsin	Katrine Colton, with EMR-S, Sheboygan, WI
	Tracey Seymour, with EMR-S, Westfield, WI

Europe	Joiners
Sweden	Eva Christina Andersson, E.U., Sweden