



**INTERNATIONAL
BROTHERHOOD
OF ELECTRICAL
WORKERS®**

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EDWIN D. HILL
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January 2, 2012

Mr. David Michaels, PhD, MPH
Assistant Secretary of Labor for OSHA
U.S. Department of Labor
Occupational Safety and Health Administration
200 Constitution Ave., NW
Washington, DC 20210

Re: RF Radiation Hazards

Dear Dr. Michaels:

The International Brotherhood of Electrical Workers (IBEW) and its membership fully appreciate the importance of your agency supporting the objective of employers providing a safe work environment for their employees. I would like to take this opportunity to share my concerns regarding the hazards related to radio frequency (RF) radiation from RF transmitting antennas across our nation.

The IBEW is committed to working with employers and the Federal Communications Commission (FCC) licensees (governmental and commercial) to overcome the challenges of protecting workers from RF radiation hazards. The IBEW recognizes that there are practical challenges that we all face in order to achieve the goal of implementing a comprehensive national RF safety protocol.

All FCC licensees' are required to ensure that, "no worker be over-exposed to RF radiation." This FCC obligation is non-delegable and applies to all individuals who may come in close proximity to RF transmitting antennas. However, on a daily basis IBEW members are compelled to work in close proximity to RF transmitting antennas without a comprehensive RF safety solution in place.

None of us can deny the proliferation of wireless and the vast number of RF transmitting antennas that exist across our nation nor can we deny the need for a new RF safety protocol that will protect the health and safety of our IBEW members and other third party workers.

The IBEW's Safety and Health Director, James Tomaseski, met with your agency regarding this issue with the specific goal of garnering OSHA's support for a comprehensive national RF safety protocol. During these meetings, it was identified that OSHA's own employees are also exposed to the same RF radiation hazards in question.





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The IBEW and other trade unions whose members are affected by RF radiation over-exposure have been in contact with RF CHECK, Inc., a San Diego based company that specializes in RF radiation safety and compliance. RF CHECK has patented a dynamic database solution that we believe is the *only* protocol to provide comprehensive, site specific RF safety information to our membership and others who may work in close proximity to RF transmitting antennas.

RF CHECK's patented RF safety solution does not burden employers, what so ever, in providing a safe work environment for their employees and supports OSHA's own health and safety directives. Their system is furnished at *no-cost* to all users including all workers, employers, FCC licensees, site owners, federal, state, and local agencies, school districts, airports, first responders, banking, utility and insurance industry, and others.

It is the IBEW's desire as well as other trade unions to gain OSHA's full support on this national RF safety protocol, and encourage OSHA to continue to work with RF CHECK in addressing this serious national RF safety issue

Thank you for your cooperation. If you should have any questions regarding this request, please contact James Tomaseski, IBEW Safety and Health Director at (202) 728-6040.

Sincerely yours,

Edwin D. Hill
International President

EDH:dmm

Copy to James R. Tomaseski, Director, IBEW Safety and Health Department