

Comments for Milestone Tower proposed location at Liberty High School Fauquier County, VA



My name is Mary Bauer and I am co-founder of Virginians for Safe Technology since 2020 and prior to that I have worked for over two and a half decades as an RF weapons system engineer for the DoD both as a contractor and a civilian employee.

Tower site location risks omitted from Milestones presentation, especially fire risks. I'd like to address the specific location of the Milestone tower selected on the [site walk on Feb 9th](#)¹ to the right and center of the softball field for the convenience of having a tall structure that can blend in with the other three tall light poles around the school property perimeter. I will mention 3 hidden risks and costs that were excluded from Milestone's presentation. We cannot cherry pick the benefits while discarding the risks, as no business economic model ever created would be successful using that approach.

1. **RFR absorption for child v. adult body is at least twice as much.** First, this is a field where children go to play sports to exercise and be healthy. It is not a zone where a communications structure should be placed that radiates RF radiation (RFR), a possible carcinogenic air pollutant, 24/7 such that children will be exposed to it the entire time they play sports. RFR goes deeper into the bodies of children than adults and therefore is processed and felt much differently. According to the Environmental Health Trust [website](#)²: **"the average RFR energy deposition for children exposed to mobile phone RF is two times higher in the brain and 10 times higher in the bone marrow of the skull compared with mobile phone use by adults."**
 - a. **RFR safety heating limit only good for 3% of the general public.** This means that unlike an adult's body, their bones are not sufficiently dense enough to stop the radiation from going deeper into the

¹ [https://go.boarddocs.com/va/fcps/Board.nsf/files/D36TTP6F213E/\\$file/Liberty%20HS%20Presentation%203.14.24.pdf](https://go.boarddocs.com/va/fcps/Board.nsf/files/D36TTP6F213E/$file/Liberty%20HS%20Presentation%203.14.24.pdf)

² <https://ehtrust.org/science/scientific-imaging-cell-phone-wi-fi-radiation-exposures-human-body/>

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body's internal organs, such as the brain, heart and lungs. This tower at that location will grant full access at ground zero to do just that to the young boys and girls on the softball and soccer teams. I encourage you to go to the website, [We are not SAM.com](https://www.wearenotsam.com)³ and read about this important topic discussing how the RFR limits were developed for a 6 ft. young adult male using a mannequin's head filled with fluid, called a "SAM" or specific anthropomorphic mannequin and why this dummy methodology falls short, is obsolete and doesn't protect children from the exposures of cell towers in close proximity to where they learn and play. It must be acknowledged that there is a serious public policy gap putting the RFR safety limits into question, how they were developed to only represent 3% of the population, and also labeled as arbitrary and capricious by the DC Appeals Court in the final order of *CHD et al v. FCC*⁴ (August, 2021).

- b. **RFR Safety Public Policy gap exists.** But industry and the FCC have no interest in filling that public policy gap even though FCC was court ordered to do so. They are more concerned with the economic impact it may have on the telecom industry if they do, than they are in being concerned about protecting the children from the harm they know it causes. In fact, "'EMR" [electromagnetic radiation] was developed initially for use by the military as a weapon"⁵ according to Jerry Flynn, retired captain of the Canadian Navy. Also, the US military knew over 70 years ago exactly how harmful RFR was. They knew from the information gathered from the Moscow Signal⁶ victims who worked at the American Embassy stationed in Moscow, who got irradiated for 10 years years prior to the US government disclosing this fact⁷ (1953-1963). Many of them developed cancer or leukemia or other chronic illnesses from low level, long term, non-thermal radiation (2-28 microwatts/cm²) much less than a modern day cell phone or baby monitor would radiate. There was also a report from the Navy Medical Research Institute (NMRI)⁸ in 1972 which was a compilation of bioeffects from 2,000 existing studies, a predecessor of bioeffects much different that the brain damage reported from the Havana Syndrome⁹ victims 44 years later in 2016.
 - c. **Thermal heating dogma vs. precautionary principle, which is best for the children?** So we must always keep in mind what the origins of this thermal heating lip service dogma is, and why best practices should be to use the precautionary principle instead. Without it, you are sentencing some of these more vulnerable children to a lifetime of sickness in their adult years or sooner. The best 3rd party independent science we have at this time to fill that public policy gap with a tower offset of approximately 1640 feet¹⁰ from where any of the children spend their time at school. This distance was determined from the *NH Commission to study the environmental and health effects of the evolving 5G technology* (Nov 2020, pg. 100) and this finding fills that public policy gap such that the children are prioritized, not industry.
2. **Insufficient tower fall zone and fire hazard risk.** Second, there is insufficient fall zone for this 150 foot tower such that if anything catastrophic occurred to strike the pole at this particular location, it could potentially fall right on top of any of the children using the field year round that are near the 50 x 50 feet

³ <https://www.wearenotsam.com>

⁴ https://childrenshealthdefense.org/legal_justice/chd-v-fcc-5g-wireless-radiation-guidelines-lawsuit/

⁵ <https://freeshuswap.com/hidden-dangers-in-memory-of-j-g-flynn/>

⁶ https://en.wikipedia.org/wiki/Moscow_Signal

⁷ <https://www.youtube.com/watch?v=c-F3nf47kAs>

⁸ https://magdahavas.com/wp-content/uploads/2020/02/Glaser_19712.pdf

⁹ https://en.wikipedia.org/wiki/Havana_syndrome

¹⁰ emfsafetynetwork.org/wp-content/uploads/2020/11/NH-State-5G-final-report-2020.pdf

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enclosure. The same is true if a fire resulted from an electrical short, surge or wire fraying in the monopole tower. The children would basically be at ground zero and would have to have an immediate response and time to evacuate the field prior to a debris field forming adjacent to the sport field areas. See telecom fires and federal bills handout¹¹ attached to this public comment that discusses fire related incidents studied in California and other states, how easily they occur on cell phone towers and making sure to have a fire evacuation plan in places for the children.

3. Digital divide will never be bridged with wireless, an inferior technology for fixed broadband.

Third, Milestone claims that this IoT tower would “bridge the digital divide” and bring fixed wireless into economically disadvantaged homes so they could stream the internet from their phone and give them more choices for Internet. This is nothing more than a marketing scheme to expand customers of a mobile use case into a fixed wireless use case and make twice as much profit. Wireless will never be the solution to the digital divide that was intentionally created when the fiber superhighway paid for with tax dollars in the 1990’s was abandoned by the industry in rural and poor neighborhoods. Although it sounds like a really good selling point, there is also no requirement for a cell tower to actually ensure that they provide service to that underprivileged neighborhood even if the tower is within eyesight in that neighborhood.¹² And even if that tower could provide service there, it is the worst use case possible for a child to engage in to use a cell phone as the primary interface for Internet. The fact that it is being promoted means that there is much ignorance about the lack of safety involved in holding a phone in your hand to stream anything which maximizes your exposure to RFR in what is called the near field, where the FCC safe exposure limit will be exceeded. Are these providers of fixed wireless informing economically disadvantaged students of this risk and how to use phones safely for Internet or even how to have a safe phone conversation? Absolutely not. All children use their cell phones incorrectly if they are making skin contact because they will exceed the FCC thermal limits after 6 minutes if they do. Therefore, mobile phones are best used for mobile purposes for short periods of time, held at a distance from the body or placed on speakerphone. Some schools across the nation and worldwide are gaining ground to move away from allowing cell phones in school or banning them altogether because they are recognizing that children concentrate better, there is less bullying, grades and moods for female students greatly improve.^{13,14} So if you follow this trend, maybe you would get these benefits at your school, too. In addition, there are alternatives to fixed wireless for emergency purposes if landlines and Ethernet go down. One such alternative is a satellite phone. In general, wired connections are always the best, fastest, most secure solution for both phone and the Internet connections at fixed locations, such as a public school.

I hope that you will deeply consider the things that I have mentioned here today and vote no on this school tower at Liberty High School. This is not an innocent technology, but must be used wisely, and appropriately for each application. Please recognize there is a public policy gap on the FCC safety limits that leaves children vulnerable, that the tower should be located off campus and the children should come first, not industry. Thank you for your time and consideration on this information.

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¹¹ https://thenationalcall.org/wp-content/uploads/2024/03/fires_telecom-fed-wireless-bills_R13r.pdf

¹² https://thenationalcall.org/wp-content/uploads/2024/03/fires_telecom-fed-wireless-bills_R13r.pdf

¹³ <https://www.nbcnews.com/news/us-news/phones-are-distracting-students-class-states-are-pressing-schools-ban-rcna140629>

¹⁴ <https://www.zerohedge.com/medical/what-happened-after-several-schools-banned-cellphones>