

September 16, 2019

Washington Jural Assembly
c/o PO Box 322
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STATE OF WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION
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To David Danner, Ann Rendahl, Jay Balasbas, Mark Johnson:

This correspondence is our written comments in Re: Rulemaking to modify existing consumer protection and meter rules to include Advanced Metering Infrastructure Docket U-180525.

This correspondence is also giving Lawful Notice and Demand to the STATE OF WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION and any and all Government, Municipalities, Cities, Townships, Public Officials: This is notice of law as applicable to your corporate and personal financial liability in the event of any violations upon the rights, privileges health and immunities of "We the People" of this state which the Washington State Jural Assembly represents.

This is our fifth notice to **cease and desist** the Advanced Metering Infrastructure Rollout using wireless technologies until the safety and efficacy can be determined. It is our recommendation that you can fully utilize wired technology which is safe, secure, reliable and readily available.

In reviewing the Summary of Comments provided in the August 14, 2019 NOTICE OF OPPORTUNITY TO FILE WRITTEN COMMENTS, I would like to specifically refer to Page 7, Section 3: Meter Testing and Accuracy Requirements, Question 11. Should companies be allowed to collect and release, with no restrictions, aggregate load information that enables the identification of customer class consumption behavioral patterns?

We fully agree with Public Counsel response which is: **Public Counsel does not recommend allowing the unrestricted disclosure of aggregate load information outside the utility's use of such data to accomplish it's primary purpose.**

The Washington Jural Assembly position is if this is not restricted, the utilities could potentially create an aftermarket for the data that would be similar to what Facebook does with the data they and their plug-in

applications collect, selling it to the highest advertising bidder. This, in our hearts and minds, would represent a breach of trust and security of the data and information being collected. Further scrutiny of this topic is deserved to ensure that there is full clarification of what is being done with the data, and that the customer is fully informed.

The next topic to address is in Section 8 in the General Comments section, and Public Comments, which has 3 categories listed. In regard to the 1st category which is **Concerns about the health impacts of RF radiation from the AMI technology**. The Staff Response is "Staff appreciates the concerns of some members of the public that AMI technology poses health issues, Staff's review of the readily available literature does not support the conclusion that AMI poses a significant threat to public health, safety or welfare. There are two studies that are cited as references in the footer: The American Cancer Society and the World Health Organization.

I would like to begin the response by defining The American Cancer Society, quoting from Wikipedia:

"The **American Cancer Society (ACS)** is a nationwide voluntary health organization dedicated to eliminating [cancer](#)....According to [Charity Navigator](#), the ACS is one of the oldest and largest volunteer health organizations...the American Cancer Society was ranked as the 10th "most popular charity/non-profit in America. The organization also runs public health [advertising campaigns](#) "

Following the link to the first specific article referenced leads to a public health advertising campaign that references **zero actual studies** and contains only sweeping generalizations on the topic that are not accurate or truthful.

Following the link to the second article leads to an error message that says "This page cannot be found".

This response is completely inadequate and does not address any of the issues brought up by the concerns that have been identified.

Please provide information about who on "the Staff" reviewed the over 1,100 pages of **scientific studies and results** and articles that the Washington Jural Assembly has provided? How did they miss the fact that the people who are **most vulnerable** to these frequencies are **children, the elderly and those with compromised immune systems**? Evidence from the studies show that even those who have healthy immune systems show rapid cell health decline through exposure. In addition **every single living being**

on earth are affected by these frequencies including our pets, livestock, birds, bugs, plants, trees, etc.

On February 7, 2019, Senator Blumenthal blasted the Federal Communications Commission (FCC) and the Food and Drug Administration (FDA)—government agencies jointly-responsible for ensuring that cellphone technologies are safe to use—**for failing to conduct any research into the safety of 5G technology, and instead, engaging in bureaucratic finger-pointing and deferring to industry.**

The March 2019 response from Washington Jural Assembly pointed out the Cancer Cluster that was caused by a Sprint 5G tower in California, the Firefighters that were affected by 5G, and the sparrows that fell dead due to exposure to 5G.

An April 1, 2019 Article titled "Planned obsolescence of health under the 5G grid" offers this information:

If you use a wireless system in your home, you are exposed to non-ionizing radiation. This doesn't mean that it's safe. Examples include: wireless router or TV, cable boxes, Playstation or Xbox, wireless cameras, keyless cars, and cordless phones. These devices transmit radio signals 24/7 as well as receive them. Any metals, from coil spring mattresses to braces in your mouth direct the waves to your body. Both you and your home become a radio station.

The 5G system is a Y-GIG wireless network that operates in bands up to 100 GHz. It requires a "5G-enabled device" or receiver (modem or chip) that rebroadcasts millimeter waves into your home.

Dr. Devra Davis, President of the Environmental Health Trust says, "Most people are unaware that these waves are cycling several billion times per second. 75 GHz is in fact 75,000,000,000 cycles per second, "which can induce unpleasant burning sensations on the skin."

In a May 2019 article titled "Is 5G Worth the Risks?"

Former FCC Chairman Tom Wheeler has made it clear the Telecom-dominated FCC does not put health first:

"Stay out of the way of technological development", he said. "Unlike some countries, we do not believe we should spend the next couple of years studying...Turning innovators loose is far preferable to letting committees and regulators define the future. We wouldn't wait for the

standards.” In response to questions about health concerns, Mr. Wheeler said: “Talk to the medical people.”

Good idea.

The “medical people” have conducted over 2,000 international evidence-based studies that link health impacts with pulsed radiowave radiation from cell towers, routers, cell phones, tablets, and other wireless devices. These studies tell us that RF radiation is harmful at even low and short exposures, and that it impacts children and fetuses more rapidly than adults. Among the findings are that RF radiation is carcinogenic, causes DNA damage, affects fertility and the endocrine system, and has neurological impacts. Pulsed electromagnetic frequencies have also been shown to cause neurological symptoms: depression, anxiety, headaches, muscle pain, attention deficits, insomnia, dizziness, tinnitus, skin tingling, loss of appetite, and nausea.

The U.S. Government has known of these risks since at least 1971, when the Naval Medical Research and Development Command published a bibliography containing 3,700 references reporting 100 biological and clinical effects attributed to microwave and radio-frequency radiation.

Recent findings, such as the \$30 million 2018 U.S. National Toxicology Program (NTP) Study, have corroborated the findings of all well-designed heart and brain cancer studies of people with 10 or more years’ exposure to cellular radiation from cell towers and cell phones. They all agree: **RF radiation causes cancer.**

The Sierra Club of California issued a response statement to the FCC fast-track of the 5G Rollout:

The Sierra Club California Conservation Committee urges the National Conservation Policy Committee to adopt an oppose position to the FCC’s recent promulgation of a rule that waives environmental review, and limits local control, of the deployment of 5G wireless technology and small cell box installations.

Contact: Jannet Benz, Southern Alameda County Group, Sierra Club, jannetbenz [at] yahoo.com

Background Information: The federal government is fast-tracking a rollout of 5G infrastructure. The FCC ruling on September 26, 2018 limits local authorities’ discretion over the placement of 5G equipment in public right-of-ways in front of homes. (1) The FCC ruling will result in cell tower installation without local community members’ knowledge or consent, and overrides local control by municipalities throughout America while waiving environmental

review on the environmental impacts of this new technology. Additional federal streamlining legislation such as (S.3157) would block the rights of local governments and their citizens to regulate and environmentally review deployment of this new technology over which the FCC waived environmental review. Currently, cell antennas may be installed on public utility poles every (2-10) houses in urban areas. According to the industry, as many as 50,000 new cell sites will be required in California alone. Mill Valley, San Anselmo, Ross, Petaluma, Hillsborough, Monterey, Palm Beach (Florida) and other cities have adopted ordinances opposing 5G. (2)

I now bring to your attention the Lawsuit filed by several cities against the FCC, including cities in Washington that are participating, which also includes an AFFIDAVIT FOR A MOTION OF STAY FROM THE CITY OF SEATTLE, WASHINGTON. The full text of the lawsuit is provided in our exhibits.

In another recent article titled "[How 5G Will Change Your Life](#)", there are several interesting excerpts. For example:

Yet, for all the fanfare, many in the industry are quietly nervous. Among other things, one of the biggest concerns is that there is no 'killer application' ready and waiting to be unleashed that requires the 5G network. That trepidation stands in direct contrast to the 4G and 3G roll-outs.

This is backed up by our dbDig primary research¹ which shows that in the US, **only ten per cent of customers are prepared to pay \$6 or more for 5G services and one-quarter of customers say they are not prepared to pay any extra at all.** Yet when we look at China a different picture emerges. Indeed, two-thirds of Chinese customers are willing to pay for 5G if it means quicker uploads to social media or the ability to play mobile games with very low load time. That is double the proportion of US customers who are willing to pay for the same services. It seems part of the reason is that the Chinese are far more likely to report issues with signal strength when they are in rural areas. Given smart phones have become a crucial engagement tool in rural Asian areas (see our piece titled, 'The emerging market technology skip') the willingness of the Chinese to upgrade is not surprising. **However, the future for 5G smartphone service in developed markets seems more uncertain.**

On top of the concerns about user uptake are the voices of health professionals, environmentalists, and politicians who worry about radiation emissions. Take Brussels, for example, a city with very strict radiation regulations. There, a pilot 5G project was halted on health grounds with the environment minister proclaiming, "The people of Brussels are not guinea pigs." **In Switzerland, authorities have commenced a 5G radiation monitoring programme.** And all this comes before considering the stern political rhetoric that has accompanied the choice of Chinese suppliers for 5G infrastructure (see our piece titled, 'The politics of 5G').

So given that many smartphone users are wondering whether they should bother upgrading to 5G, the network providers cannot be blamed for wondering just how aggressively they should spend the money to roll out 5G networks. Consider that 5G works on a much shorter wavelength than 4G. Because of that, it cannot travel as far as the longer wavelengths of earlier networks. It also has more trouble penetrating the thick walls of buildings. To deal with this, network providers will need to install perhaps five times more base stations than they have with 4G, and some of those stations may be more costly to build. The extra cost, then, is significant and the initial roll-outs will almost certainly be confined to densely-populated urban areas.

...The thing is that unlike the move to 3G and 4G, **some of the most important uses of the 5G network are unlikely to take place on a smartphone, at least for now.** Instead, the initial uptake in 5G will likely be driven by the manufacturing industry and **public utilities, not individual consumers.**

Therefore, in summation, the use of Smartmeters (AMI) aka Advanced Metering Infrastructure is designed to benefit the Utility Companies. But unlike the reference from the article above, which states "public utilities", most of the utility companies have either been privatized or are in the process of being privatized. Which, bottom line, means that this entire technology motivation, benefits the CORPORATIONS and does not benefit We The People.

Finally, the recent 5G Crisis Awareness & Accountability Summit that took place from August 26 – September 1, 2019 found these results:

It turns out that local governments have been systematically fed false information by industry-paid legal consultants, so that they acquiesce to the unprecedented, unlawful land-grab that is 5G.

This has put our local governments under a spell thinking they have no power, responsibility or accountability regarding 5G deployments.

We are adding 11 additional articles as exhibits and addendums to this response. 7-11 are duplicates since it seems the information we have provided to date has been overlooked including the over 1100 summary pages on studies conducted all over the world and published on <https://bioinitiative.org/>. These articles again highlight the fact that the wireless technology plugging into and utilizing the 5G network is not safe for any living entity. The articles are as follows:

- 1) Is 5G Worth the Risks?
- 2) Planned obsolescence of health under the 5G Grid
- 3) Electrosmog impact on environment and climate
- 4) Hundreds of Bees are Dropping Dead around 5G Cell Phone Towers in California as Controversy Mounts around New Mobile Technology

- 5) How 5G Will Change Your Life
- 6) UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT CASE #19-70326
- 7) Brussels Halts 5G
- 8) Vaud Switzerland Moratorium on 5G
- 9) French Court Rules Against Utility Smartmeters
- 10) Cancer Cluster at California Elementary School Results in Removal of Sprint Tower
- 11) There Are No Studies that Show that 5G is Safe
- 12) 5G Harming Firefighters in California
- 13) The Dangers of 5G to Children's Health
- 14) Radiofrequency Expert Warns 5G Radiation Could be Carcinogenic
- 15) 5G in Action - Sparrows Fall Dead from the Roof
- 16) Bioinitiative Research Summary

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Without Prejudice UCC 1-308