### Submitted to [info@icnirp.org](mailto:info@icnirp.org)

### Date: 9/2/18

Submitted by: H Davis, No affiliation,

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**Re: ICNIRP Consultation - RF Consultation Draft 2018**

On behalf of individuals diagnosed with numerous negative medical impacts from RF exposure please acknowledge in your updated guidelines the facts borne out by volumes of scientific reports showing biological harm at sub thermal levels that your underlying documentation is NOT protective of all possible impacts. Your documentation so states the following:

“*Different groups in a population may have differences in their ability to tolerate a particular NIR (non-ionizing radiation) exposure. For example, children, the elderly, and some chronically ill people might have a lower tolerance for one or more forms of NIR exposure than the rest of the population. Under such circumstances, it may be useful or necessary to develop separate guideline levels for different groups within the general population, but it may be more effective to adjust the guidelines for the general population to include such groups.* ” from ICNIRP Statement, General Approach to Protection Against Non-ionizing Radiation.

Your failure to protect children and vulnerable groups is unacceptable and negligent.

Problems with ICNIRP Guidelines:
Simultaneous exposure of agents
“Some guidelines may still not provide adequate protectio...