

June 8, 2007

Dr. Rick Jostes
Nuclear and Radiation Studies Board
National Academy of Sciences (NAS)
500 Fifth St., NW
Washington, DC 20001

Re: Proposed Membership of the Committee on the "Identification of Research Needs Relating to Potential Biological or Adverse Health Effects of Wireless Communications Devices"

Dear Dr. Jostes:

The proposed members of this committee are all well-known members of the EMF/RF community. They do not, however, represent the diversity -with respect to both expertise and outlook- of this community.

Only one (McCormick) of the proposed members has training in the life sciences. In contrast, five of the seven were trained in engineering or applied physics. The seventh (Kheifets) is trained in mathematics, statistics and epidemiology.

The NAS should seek out greater representation from the biological, medical and public health communities. After all, the charge of the committee is to address possible biological and health effects.

The NAS is relying too heavily on ICNIRP, the International Commission on Non-Ionizing Radiation Protection. Of the seven candidates, three (Hietanen, Matthes, and Veyret) are members of ICNIRP and one (Kheifets) is a member of an ICNIRP standing committee. Indeed, all the non-U.S.-resident candidates are from ICNIRP.

It should be noted that ICNIRP is not a transparent organization. It has never disclosed the sources of its funding nor the procedures for the selection of its members. ICNIRP was established by Mike Repacholi, who has long had financial ties to both the telecom and electric utility industries.

ICNIRP sets exposure guidelines for all types of non-ionizing radiation. To date, it has taken a very conservative approach: ICNIRP members have declined to recognize the need to protect against possible long-term (chronic) effects, or to endorse precautionary policies.

The NAS should seek greater balance -especially among the European candidates. There are many respected members of the EMF/RF community who have opinions that lie outside of the ICNIRP framework.

Finally, there is the question of why the NAS selected Kheifets, who has spent much of her professional life working for the electric power industry. Kheifets ran the EMF program at EPRI, the industry's research arm. On leaving EPRI, she became the protégé of Mike Repacholi at the World Health Organization. EPRI later contributed to her work for WHO. Kheifets is now once again working for EPRI, this time as a consultant. Though historically focused on power-frequency EMFs, EPRI now has an interest in the RF portion of the spectrum. There are many talented epidemiologists who do not have such potential conflicts of interest, as does Kheifets.

Here are some candidates who would help diversify the committee:

Carl Blackman, U.S. EPA, Research Triangle Park, NC
David Carpenter, Institute for Health and the Environment, SUNY, Albany
Michel Coleman, London School of Hygiene and Tropical Medicine, U.K.

Michael Kundi, University of Vienna, Austria
Dariusz Leszczynski, Radiation and Nuclear Safety Authority, Helsinki, Finland
Gregory Lotz, U.S. NIOSH, Cincinnati, OH
Kjell Hansson Mild, University of Umeå, Sweden
Sam Milham, Olympia, WA
Morando Soffritti, European Ramazzini Foundation for Oncology and Environmental
Sciences, Bologna, Italy
Daniel Wartenberg, Environmental and Occupational Health Sciences Institute, Robert
Wood Johnson Medical School, Piscataway, NJ

Note that Coleman, Kundi, Milham and Wartenberg are all epidemiologists. In addition, Coleman, Kundi and Milham have training in medicine.

Thank you for considering these comments.

Sincerely,

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