



Please see attached DRAFT
of previous MMF meeting in
Germany. Verjet's role is clear
and unequivocal.

(12)

Dear Colleague,

I am writing in response to recent discussions about the organization of a seminar on mechanisms for interactions of RF energy with biological systems. The Mobile Manufacturers Forum (MMF) would like to confirm that the seminar will take place, and would like to invite you to participate. The meeting will take place on 22/23 May 2001, at the Radisson Barcel Hotel (Phone 800/333-333 Fax 202/857-0134) 2121 P St. NW in Washington, D.C.

In order to assist participants in attending the event, the MMF is willing to reimburse you for your expenses in connection with the meeting. Please see the attached document for details of the reimbursement policy of the MMF.

To assist with planning, the MMF would appreciate an indication from you of your intention to participate as soon as possible, or at the latest by 13 April.

The remainder of this letter provides the rationale for the seminar and provides some background information as well as some draft material for use at the meeting. Any comments on this draft material would be most welcome in advance of the meeting in order to ensure the best use of the available time and to allow for any redrafting to take place prior to the meeting.

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There have been a number of suggested mechanisms relevant to low-level exposures of RF. The goal of the seminar is to ascertain the plausibility and relevance of specific proposed mechanisms and identify where more theoretical or even experimental investigations could be useful. Frequencies of approximately 10 MHz to 10 GHz are under consideration, with possible extension to 60 GHz if this does not protract discussions.

The seminar aims to frame possible biological effects by their underlying biophysical mechanisms according to this simplified scheme: physical interactions may lead to biochemical changes and finally to biological responses. This stress on biophysical interactions means that the seminar will not evaluate particular biological research outcomes, but emphasize consideration of possible physical interactions.

For purposes of our discussion definitions of "athermal" and "nonthermal" effects may be useful. "Athermal" effects are those occurring when the average SAR is low enough that a significant increase in temperature cannot be measured in the exposed animal or laboratory system. "Nonthermal" effects occur when the average SAR is even lower, such that a significant temperature increase would not occur even without thermoregulation by animals or the laboratory apparatus.

Two lists are attached to this letter: 1) physical and biophysical mechanisms for RF interactions that might bear on possible biological responses to RF energy, and 2) categories for their plausibility and applicability. Some of the listed mechanisms are well studied and generally accepted, but others are speculative. Discussions of interactions with athermal and nonthermal CW signals also may be useful in achieving this goal. Although we wish to develop an all-inclusive final list of mechanisms, there is no intention to consider all items in depth. A thoughtful sorting of the existing mechanisms for relevance to athermal/nonthermal effects will be one useful outcome of the seminar and its preliminary activities.

The seminar will not revisit the well known physiological and behavioral effects caused by increased temperatures in RF-exposed animals and their tissues. Instead, interest is directed to biophysical mechanisms that could underlie possible effects such as those reported for amplitude modulated and pulsed RF fields. For the present purpose pulsed waveforms are considered a particular type of amplitude modulation.

Modulated RF energy occurs in a very great number of forms in telecommunications and other wireless technologies. For example, NADC, GSM, GPRS, UMTS, iDEN, TETRA, Bluetooth, and digital broadcasting are among the better known. RF energy sources include mobile phone handsets, signals from cell, microcell and picocell base stations, wireless applications in the office, hospital, clinic, factory, and automobile. In wireless communications, the older analog transmission system uses frequency modulation and is not time-multiplexed. A large number of specific techniques exist for transmitting digital signals. Many involve phase-shifting or frequency-shifting of the carrier in dedicated channels that are time-multiplexed (TDMA), which introduces a pulsatile character to the signal. Other transmissions are encoded by spread spectrum techniques (e.g., CDMA). Although modern telecommunications systems do not use amplitude modulation of the type used for AM radio broadcasting, many of the digital encoding techniques result in pulsing of the RF carrier at repetition rates in the ELF range and may also feature changes in RF amplitudes at low frequencies.

After we have settled on procedures and the two lists, you will be asked (by e-mail) to place each mechanism into an appropriate category. At the meeting, we can focus on disagreements about the categorization if these have not already been resolved. After the exercise of sorting the mechanisms into categories, we will discuss the mechanisms of greatest interest and determine whether and what further information needs to be developed for any of the mechanism. The likely result is general agreement about many of the mechanisms and disagreements over a few others.

It bears stating the obvious: A biophysical mechanism takes on meaning only in the context of a particular biophysical substrate, which for our interests can range from the simplest levels of organization such as ions and chemical sub-groups to cellular assemblies organized into organs. Please be explicit about context in your responses and when planning for the meeting, or else we risk misunderstanding each other.

Pre-meeting exchanges will be done blindly so that particular ideas are not identified with individuals, thereby reducing inhibitions that might affect candor. Please send e-mail correspondence on scientific issues directly to Asher Sheppard (ashersheppard@compuserve.com), who will act as a clearinghouse to reduce some of the e-mail traffic. Please let him know if you would like your views to be identified by name rather than remaining anonymous.

The seminar will not have a program of prepared papers. Instead, discussions will be stimulated by topic leaders prepared to discuss particular mechanisms in some technical detail. Topic leaders would be assisted by discussants who have also familiarized themselves with technical issues so that the discussions can proceed on a quantitative basis insofar as possible. After attempting to achieve consensus about the relevance and plausibility of a mechanism, the discussion will then move to recommendations for additional research.

We are looking forward to the seminar and the challenges that it presents. You may already have approached some of the issues informally and some have been discussed in publications. However, the seminar will provide an excellent opportunity to focus attention on plausible mechanisms and provide sound scientific arguments against implausible ones.

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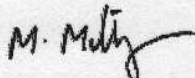
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If you have suggestions about the above procedural outline, or would like more information of any sort, please do not hesitate to contact me on +32 2 706 8567 or by email michael.milligan@mmfai.org.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'M. Milligan', with a stylized flourish at the end.

Michael Milligan
Secretary General

March 19, 2001

This draft was prepared for discussion at the MMF

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Report from a Workshop on:

Meeting in Washington D.C. May 22-23 2001

„Biological and Biophysical Research at Extremely Low- and Radio-Frequencies: (1) Application of Research Results across the Frequencies and Modulation Schemes of Present and Future Wireless Technologies, and (2) Demodulation in Biological Systems”

4th – 5th December 2000
Bad Münstereifel, Germany

*See PL 895
PS. ll. 135-136*

Prepared by co-rapporteurs Roland Glaser, PhD, Christopher Portier, PhD, and Asher Sheppard, PhD. We gratefully acknowledge helpful editorial comments from Drs. Kenneth Foster, William Pickard, and Bernard Veyret.

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Brief Summary

Do similar biological effects occur over the range of frequencies and modulation types used in modern wireless communications, or do particular signals have unique biological effects? Rapid technical change in wireless communications and ever-wider human exposure to its radiofrequency (RF) fields add urgency to this long-standing question about the nature of biological effects of RF exposure. The ability to apply biological research information broadly, rather than requiring specific testing for each signal type, has been called “portability”. The workshop addressed 1) whether biological systems respond to modulation of an RF field, 2) whether the results of research on ELF fields relevant for RF fields modulated at ELF, and 3) whether results obtained with one modulation scheme relevant for others. The international group of scientists at the workshop shared an understanding that the key to portability lies in the mechanisms of interaction between RF fields and biological systems.

To establish portability, one research model is to form hypotheses for future biological research on modulation with guidance from mechanisms for the physical interactions of electromagnetic fields with biochemical and biological systems. “Microdosimetry,” in the form of biophysical analyses using dielectric theory to quantify effects on biological cells, cell membranes, and subcellular entities, was identified as an important topic in the study of physical mechanisms. For frequencies above approximately 10 MHz, which includes all common wireless communications, there is no evidence that ELF electric and magnetic fields

(ELF-EMFs) are produced at biologically significant levels in biological systems as a result of direct demodulation of modulated RF electromagnetic fields (RF-EMFs). Moreover, the mechanisms for producing biological effects by exposure to an ELF field show lowpass properties, and are not significant at RF frequencies. Consequently, physical principles indicate that the extensive literature from studies conducted at power frequencies (50 and 60 Hz) is not directly portable to RF-EMFs. However, participants noted that research strategies developed from the conduct of ELF-EMF research programs could provide valuable guidance for RF-EMF research.

An alternative RF-EMF research model stresses testing directly for phenomena. This perspective emphasizes epidemiological investigations and studies of laboratory animals exposed to specific device characteristics using specific exposure scenarios. Guidance from physical mechanisms is given less emphasis in favor of answering questions directly from human health experience and laboratory research with animals. Generalizations permitting portability would be drawn from phenomenological databases and secondarily would make use of mechanistic models. Likewise, risk assessments for a particular RF exposure mode would consider the acquired data together with considerations derived from research on mechanisms of interaction. Such research can help determine which parameters of exposure (among an infinite number of possible parameters) are significant. This research model gives little opportunity to avoid a multiplicity of tests for each of the distinct modes of RF exposure, although in time, confidence in the research and interaction models can build sufficiently to permit setting rules for portability.

1. Background and intentions of the workshop

The number and variety of radio technologies have increased dramatically in recent years. In addition to existing cellular telephone systems that use FM, TDMA (e.g. GSM), CDMA, and other modulation techniques, UMTS cellular telephones and Bluetooth devices for local wireless networking and data transmission are prominent among forthcoming technologies¹. At the same time, there is interest in biological research to assess potential

¹ FM, frequency modulation; TDMA, time domain multiple access; GSM, global system for mobile communications; CDMA, code domain multiple access, UMTS, universal mobile telecommunications system; Bluetooth denotes a low power, low bandwidth wireless interconnection standard operating over a range of about 10 m.

64 health risks of radiofrequency electromagnetic fields (RF-EMF). However, a prohibitive
65 number of investigations would be needed if each modulation scheme were fully tested in a
66 battery of experiments. A large experimental database demonstrates hazards from acute and
67 chronic exposures only if the body or localized tissues are heated, typically requiring an
68 increase of several degrees. There also is a body of uncertain evidence for biological effects
69 under exposure conditions that, with varying degrees of certainty, do not produce significant
70 heating. Lastly, there are data showing modulation-specific effects, but no direct evidence for
71 hazardous effects specific to modulation. However, the rapid expansion of wireless
72 communications occurs at a time when evaluations of all potential categories of hazard are
73 incomplete and when it appears that exhaustive proof of safety by individually testing all
74 waveforms and devices is not feasible.

75 The workshop addressed "portability," the transfer of biological research information
76 across the frequencies and modulation types that characterize modern radiofrequency
77 communications. The biological significance of low frequency signal components encoded in
78 radio signals was addressed in light of normal nerve and muscle activity that produces low
79 frequency electrical activity in the body over the range from a few hertz to a few thousand
80 hertz. The workshop examined biophysical and biological information to address the
81 hypothesis that biological systems respond to modulated radio frequency signals through
82 direct demodulation or other mechanisms.

83 The workshop focused on three main questions:

- 84 • Can biological systems respond to the modulation of radio waves?
- 85 • Are results from research conducted with extremely low-frequency fields relevant to the
86 RF range ("ELF to RF portability")?
- 87 • Are results from biological research conducted with one modulation scheme relevant for
88 other modulations and other carrier frequencies ("modulation scheme portability")?

89 Definitive answers to these questions would permit a more systematic understanding
90 of past and future RF research by leading to a better grasp on the mechanisms of field effects
91 on biological systems. In turn, health risk assessments for present and emerging radio
92 technologies will be more reliable and better received by both scientists and the public.

93 Forty-two specialists from Europe and United States attended the meeting, which
94 featured lectures from 12 invited speakers and several lengthy discussion periods. The



95 workshop was sponsored by the Forschungsgemeinschaft Funk (Research Association for
96 Radio Applications), in cooperation with the Berufsgenossenschaft für Elektrotechnik und
97 Feinmechanik (Germany), and COST 244bis (a committee of the European Cooperation in
98 the field of Scientific Technical Research that is focused on the biomedical effects of
99 electromagnetic fields).

100

101 **2. Program and course of the workshop**

102 As an introduction to the many technologies now in use and planned for the near-term,
103 H. Hirsch, Dortmund (Germany), presented an overview of current and emerging
104 technologies for wireless communications, including their signal characteristics and the
105 strength and duration of exposures.

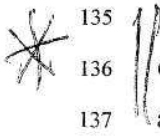
106 The topic, "Can research results from the ELF area be transferred to the
107 radiofrequency area?" was developed by seven presentations and discussions led by session
108 moderator C. Portier, Research Triangle Park (USA). The speakers and titles of their talks
109 were:

- 110 • "Established and proposed mechanisms of interaction at radio frequencies", K. Foster,
111 Philadelphia (USA),
- 112 • "Studies on effects of ELF and non-thermal, modulated radiofrequency on biological
113 molecules and sub-cellular fractions", S. Johnston, London (UK),
- 114 • "Studies on effects on the level of cells and tissue", B. Veyret, Bordeaux (France),
- 115 • "Studies on effects of ELF and non-thermal, modulated radiofrequency on the level of
116 cells and tissues", R. Meyer, Bonn (Germany),
- 117 • "Studies on effects of ELF and non-thermal, modulated radiofrequency on the level of
118 animals", A. Lerchl, Münster (Germany),
- 119 • "Studies on effects of ELF and non-thermal, modulated radiofrequency on the level of
120 humans", U. Bergqvist, Linköping (Sweden),
- 121 • Limits and basic problems in research on non-thermal biological effects of LF and RF-
122 EMF and for detection of demodulated signals in the presence of noise of physiological
123 origin, M. Swicord, Ft. Lauderdale (USA).

124 The second major topic, "Can biological systems demodulate radiofrequency
125 signals?" was moderated by C. Davis, College Park (USA) and featured these presentations:

- 126 • "Biophysical mechanisms for demodulation", J. Silny, Aachen (Germany),
- 127 • "Non-linearity in biochemical and biological functions; implications for demodulation", J.
128 Weaver, Cambridge (USA),
- 129 • "Membrane models for interactions with modulated fields", G. d'Inzeo, Rome (Italy),
- 130 • "Laboratory studies on demodulation by biological cells and tissues", W.F. Pickard, St.
131 Louis (USA).

132 As part of this topic, A. Sheppard, Redlands (USA) led a discussion on a recent result in
133 microdosimetry (calculation of cell membrane RF field strengths) and on the evidence and
134 theory that apply to each of the major types of modulation.

135  B. Veyret, Bordeaux (France), led the final session in which he presented an overview
136 of workshop ideas and led discussions that examined the value of various theoretical
137 approaches and looked forward to the features needed in future research.

138

139 **3. Principal ideas from the lectures and discussions**

140 ***Technical features of current and emerging technologies***

141 A variety of modulation techniques is in use and planned. The number of RF energy
142 sources and the variety in modulation techniques are expected to increase in the future. Some
143 examples are "Bluetooth" devices (using time division duplex division and frequency
144 hopping techniques), digital radio and television broadcasting (using coded frequency
145 division multiplexing and various phase shift modulations in bands), cellular telephony (using
146 pulse, phase, and amplitude modulations for digital systems and frequency modulation for
147 analog systems), wireless devices for computers and entertainment, and collision avoidance
148 radar for automobiles.

149 ***Are results from research conducted with low-frequency fields relevant*** 150 ***to the RF range?***

151 Most participants felt there was no existing theory that would support the linkage of
152 research findings on ELF-EMF to RF-EMF. No one expressed doubts about the conclusion

153 that exposure to amplitude modulated RF-fields in the frequency range of mobile telephones
154 is unlikely to produce biologically significant ELF electric fields across the cell membrane, or
155 elsewhere in biological systems. This view is based on biophysical theory and a limited
156 amount of supporting experimental data. Consequently, results from biological effects
157 research with ELF-EMFs are very unlikely to have any direct bearing for exposures to RF-
158 EMF.

159 ***Are there experimental observations that clearly indicate that modulated***
160 ***RF-fields have specific biological effects in contrast to unmodulated fields?***

161 There are abundant data showing that modulated high-level RF fields have biological
162 effects and that modulation is an important factor (for example, consider the studies on
163 microwave hearing). However, these have no direct bearing on RF signals typically used by
164 communications systems.

165 Although a number of experimenters have reported effects that depend on amplitude
166 modulation at low levels of RF exposure ("non-thermal" SARs that are below exposure
167 guideline limits set by ICNIRP, ANSI/IEEE and others), the effects remain isolated to
168 particular *in vitro* systems and have not generated models that can be applied to portability
169 across the various types of amplitude modulation. Although a few experiments have been
170 repeated successfully in independent laboratories, others have not, and the question of
171 whether modulation is important for biological effects remains open. Many participants
172 emphasized that established hazardous effects of RF fields of the kinds used in
173 communications systems (pulsed and non-pulsed) are associated only with excessive heating.
174 These and other participants felt the need for further research data specific to modulated RF
175 fields in general and new technologies in particular.

176 ***What are the demonstrated and potential mechanisms for demodulation***
177 ***in biological systems?***

178 Several mechanisms were discussed in consideration of the possibility of unique
179 biological responses to amplitude modulation and pulse modulation, which can be viewed as
180 a type of amplitude modulation.

181 Can biological systems extract a low frequency signal from modulated RF fields? In
182 answer to this basic question, the participants could not identify a biological structure that
183 could demodulate the RF signals used in existing and emerging wireless technologies and

184 thereby produce ELF fields at a biologically significant level. Identified nonlinear interaction
185 mechanisms require responses at the carrier frequency of the field and these decline sharply
186 for frequencies greater than a few kilohertz and become very ineffective at radiofrequencies.
187 RF fields will induce membrane potential changes up to the gigahertz range, but the potential
188 changes are very small above the cell cutoff frequency, which is typically in the low
189 megahertz range. Biological studies show that the maximum frequency at which
190 demodulation can be measured in cell preparations is about 10 MHz, and at that frequency the
191 process is extremely inefficient. A review of biophysical theory and experiments indicated it
192 is highly unlikely that the identified nonlinear interactions in biological systems would
193 produce fields of a biologically significant magnitude by physical demodulation of RF fields
194 induced in the body by low-powered communications equipment.

195 One idea is that at frequencies above 10 MHz biological structures may support a
196 form of demodulation as a consequence of the observation that biological systems are
197 thermodynamically open, operate far from thermodynamic equilibrium, and are characterized
198 by non-linear dynamic responses. Consequently, it has been suggested that there may be non-
199 linear responses to RF fields. This idea has not been evaluated critically or tested
200 experimentally and therefore remains speculative. In addition, critics have stated that
201 naturally occurring damping mechanisms would prevent non-linear dynamical effects.

202 There is also a proposal that demodulation might occur because of a direct, time-
203 varying influence on ongoing biochemical reactions. In this case, modulation patterns would
204 be important because rapid variations in RF energy could affect the rates for molecular and
205 supramolecular chemical reactions. For example, reactions involving calcium ions might be
206 affected by sinusoidal or pulsed modulation at ELF frequencies. This speculation has not
207 been developed into a theory that can be subjected to critical review.

208 Participants felt that frequency modulation (FM), which involves a frequency shift
209 that is a very small percentage of the carrier frequency, is unlikely to change biological
210 responses to RF fields.

211 ***How might portability be affected differently by thermal and non-thermal***
212 ***effects?***

213 Although there are different definitions of the terms "thermal", "athermal", and "non-
214 thermal", usually a thermal effect involves an increase in temperature that is biochemically or

physiologically significant, for example, by affecting biochemical temperature sensitive reaction rates. Thermoregulatory responses and (at a high exposure level) physiological stress occur when body temperature is increased sufficiently. However, microwave heating is an example of a thermal effect that occurs with an immeasurably small net temperature increase and depends on the rate of temperature change. At lower levels, "athermal" exposures occur with significant heat flow, and possible thermoregulatory effects, although body temperature changes are small or not detectable. Still lower exposures are "nonthermal" because heat flows and temperature changes are so slight that neither biochemical nor physiological effects are likely to be detectable. At least one member of the panel felt this issue had not been adequately addressed from both experimental and theoretical views and felt there were no clear definitions of what constituted thermal versus nonthermal exposures when dealing with net energy input into a biological system and in consideration of the multitude and complexity of the biochemical reactions in biological systems.

Discussion revealed interest in additional quantitative studies of localized heating and energy transport that occurs without significant temperature gradients. Analyses at millimeter and microscopic dimensions (sometimes called "microdosimetry") are still rare in comparison with macrodosimetric studies of external fields acting on the body at the anatomical level. The temporal and spatial nature of temperature gradients at a microscopic level provoked discussions about whether microscopic "hot-spots" could arise because of differential RF absorption by cell membranes, water layers, and proteins. Participants stated that any such analyses should be undertaken with recognition of severe limitations imposed by the quantitative heat transfer studies first conducted in the 1940s. These demonstrated that the rapid diffusion of heat over micrometer-sized volumes, typical of cells, precludes any meaningful temperature gradients over microscopic dimensions for exposures to RF fields such as those produced by handheld communications devices. No one opposed the statement that qualitative discussions were not sufficient to evaluate the proposal that rapid energy transfer over sub-cellular and molecular dimensions be considered as a possible mechanism for RF field interactions. Some participants emphasized the potential importance of this idea and advocated calculations to address it, but others emphasized doubts that there could be any biochemical or biological interaction in the face of rapid temperature equilibration occurring on the microsecond time scale.

Are investigated modulation schemes relevant for other modulations

247 ***and other carrier frequencies ("modulation scheme portability")?***

248 There was agreement that this form of portability, which would allow generalizations
249 and extrapolations across modulation schemes, would be supportable only if there were
250 agreement on the accepted mechanisms of interaction of the field with biological systems. At
251 present, only the thermal mechanism satisfies the requirements for portability, and this
252 mechanism does not suggest that modulation plays a role for exposures with comparable
253 average SARs. Thermal considerations indicate that, with two exceptions, results with
254 different modulation patterns are equivalent if their average heating effects are the same. The
255 exceptions occur for high-intensity pulses that can elicit a pulse-dependent auditory response
256 ("microwave hearing") as the result of a small pressure wave that occurs when the brains of
257 exposed subjects undergo sudden thermal expansion, or high rates of change of temperature
258 that can depolarize membranes. This thermal expansion, which requires field strengths that
259 greatly exceed levels produced by the use of wireless devices, produces pressures too low to
260 be anticipated as the cause of adverse effects.

261 ***What do we know about mechanisms of interaction of RF-EMF with***
262 ***biological systems?***

263 Resolution of portability issues requires renewed consideration of all possible
264 mechanisms. Thermal effects (and effects presumably thermal in origin) have been studied
265 extensively at anatomical levels in animals and human subjects and in a large number of *in*
266 *vitro* biological preparations. The common dosimetric measures for microwaves, specific
267 absorption (SA) and specific absorption rate (SAR), are inherently thermal in nature, but
268 discussants noted that temperature is a still more fundamental measurement of thermal
269 effects. Alternatively, SAR and SA also are useful measures of exposure in the absence of
270 measurable temperature change. It also was stated that despite many attempts to devise
271 biophysical models for nonthermal effects, there are none that have been experimentally
272 verified or are free from devastating theoretical criticism. The observation was made that
273 many questions about biological effects of RF energy at the microscopic level correspond to
274 the question of whether RF energy affects biological chemistry, based on recognizing that
275 biochemical changes can lead to biological effects. Temperature unquestionably affects
276 biochemical reactions, but some discussants saw a need for further mechanistic biophysical
277 research into the possibility of alterations of cellular function even if temperature changes are
278 small in comparison with normal fluctuations of body temperature.

279 ***Strategies for future research activities to develop scientific data and***
280 ***tools for risk assessments of emerging RF technologies***

281 Based on recognition by workshop participants of a need for more research into
282 biological effects of amplitude modulated (including pulsed) RF fields, there were
283 exploratory discussions on desirable approaches for this research. The principal question was
284 whether research should be driven by hypotheses generated directly from biophysical theory,
285 or if it should be guided by existing reports of biological effects, or based on the classical
286 toxicological screening paradigm for environmental safety assessment.

287 There was little support for follow-up research on reported biological effects that were
288 difficult to replicate and not supported by biophysical theory. Support for a routine safety
289 assessment was based upon the general concept that establishing safety does not always
290 require hypothesis driven research, but instead can be based on development of a "comfort
291 level" with the data, such as has been established for other environmental agents in a process
292 requiring many years. There was also strong support for hypothesis driven research that could
293 enhance understanding of mechanisms of interaction. Investigations bearing on the coupling
294 of fields to molecular and biochemical events were identified as a promising approach.

295 A brief discussion presented the idea that high duty rate pulsed fields and amplitude
296 modulation of the type used for spread spectrum communications (for example, CDMA
297 wireless telephony) appear less likely to have biological effects than low duty rate pulses and
298 sinusoidally amplitude-modulated signals. Furthermore, studies with low duty rate pulsed
299 waveforms were thought more likely to be useful than those with sinusoidal amplitude
300 modulation. One speaker suggested conducting biological experiments with different duty
301 factors while holding average power constant.

302 Consideration of the relative value of research conducted at different hierarchic levels
303 provoked discussions of the different types of information obtained from epidemiological,
304 toxicological, and laboratory investigations. In illustration of this point, it was noted that
305 multicellular systems are capable of greater sensitivity than single cells, although at the
306 sacrifice of response speed. (Examples of this concept can be found in sensory physiology,
307 such as electroreception in certain fish and the highly evolved senses found in animals and
308 man. Electroreception is limited to fields at extremely low frequencies and has no direct
309 relevance to RF bioeffects.) The hierarchical concept suggests a limitation for extrapolations

340 subcellular entities is needed to achieve a better understanding of the proposal that in
341 the absence of overall temperature change, RF energy might influence biochemical
342 processes over microscopic dimensions and sub-microsecond times. However,
343 existing research on heat transport at microscopic dimensions sets the challenge of
344 how RF energy, which at the microscopic level cannot introduce significant
345 temperature gradients, might be biologically significant.

310 made from data obtained at very low levels of organization. At the other extreme, human
311 studies are limited by practical and ethical constraints on experimentation as well as uncertain
312 interpretation of physiological changes. For example, transient changes in EEG may be a
313 benign biological response, but it is not logically possible to exclude the possibility of a
314 related health effect. Several studies of brain cancer and other diseases among users of
315 cellular telephone handsets have been reported recently and others are in progress. However,
316 it is anticipated that epidemiological studies of persons exposed to RF fields from wireless
317 technologies will not yield firm conclusions in the near future.

318

319 **4. Conclusions**

- 320 • At the present time, the concept of a demodulation process producing an ELF-EMF
321 field at a biologically significant level in biological systems exposed to amplitude
322 modulated RF fields used for telecommunications is not supported by either a
323 defensible theory or direct experimental evidence.
- 324 • The problem of "portability" of biological effects from one kind of modulation to
325 another can be solved by knowing the relevant basic mechanisms of interaction. This
326 knowledge requires a theory and supporting data.
- 327 • Alternatively, portability may emerge by development of a substantial database from
328 phenomenological research on each of several of RF signal types.
- 329 • The concept that biological effects of RF energy are caused by heating is well
330 established. This concept supports a degree of portability among different RF
331 bioeffects studies, and suggests that average SAR (and not specific waveform
332 characteristics) is the major dosimetric quantity of biological significance. However,
333 controversy exists because although heating can explain effects observed for high
334 power levels, it does not appear to explain effects reported at low power levels. There
335 often is controversy about the reliability of such effects because of conflicting data or
336 the absence of independent experimental confirmation.
- 337 • Further research is necessary on the question of whether modulated fields, including
338 pulsed fields, differ in effectiveness in comparison with unmodulated fields.
- 339 • Further research on microdosimetry that applies dielectric theory to cells and