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United States District Court

District of Oregon

Portland Division

AHM, by and through
her Guardian *ad litem* and father,
David Mark Morrison, and
David Mark Morrison, individually,

v.

Portland Public Schools,
Defendant.

Civil Action No. 3:11-cv-00739-MO

**Amended Declaration of
Dr. David O. Carpenter, M.D.**

I, Dr. David O. Carpenter, M.D., under penalty of perjury pursuant to 28 U.S.C. § 1746, hereby make the following declaration in support of an injunction against Portland Public Schools' use of WI-FI:

1. I am a public health physician, educated at Harvard Medical School. My current title is Director of the Institute for Health and the Environment at the University at Albany and Professor of Environmental Health Sciences within the School of Public Health. Formerly, I was the Dean of the School of Public Health at the University of Albany and the Director of the Wadsworth Center for Laboratories and Research of the New York State Department of Health.

2. I served as the Executive Secretary to the New York State Powerlines Project in the 1980s, a program of research that showed children living in homes with elevated magnetic fields coming from powerlines suffered from an elevated risk of developing leukemia. After this I became the spokesperson on electromagnetic field (EMF) issues for the state during the time of my employment in the Department of Health. I have published several reviews on the subject and have edited two books.

3. I am a Co-Editor and a Contributing Author of the *BioInitiative: A Rationale for a Biologically-based Public Exposure Standard for Electromagnetic Fields (ELF and RF)*, www.bioinitiative.org. It documents bioeffects, adverse health effects and public health conclusions about impacts of electromagnetic radiation (electromagnetic fields including extremely-low frequency ELF-EMF and radiofrequency /microwave or RF-EMF fields). The public health chapter from this report was subsequently published in a peer-reviewed journal.

4. Additionally, I am a Co-Author of *Setting Prudent Public Health Policy for Electromagnetic Field Exposures*, *Reviews on Environmental Health*, Volume 23, No 2, 2008, attached as Addendum A-2.

5. In addition, in 2009, I was invited to present to the President's Cancer Panel on the subject of powerline and radiofrequency fields and cancer, and have testified on this issue before the United States House of Representatives.

6. In sum, I am a public health physician, professor and former public health school Dean with expertise in electrophysiology, low-frequency electromagnetic fields bioeffects, and

radiofrequency (RF) and microwave (MW) radiation bioeffects.

7. WI-FI deploys pulse-modulated (“PM”) microwave (“MW”) radiation (within the larger RF radiation spectrum) with a carrier frequency that is similar to that used by a microwave oven: about 2.45 GHz. This is the “Agent”. The 2.45 GHz frequency was chosen for the oven because of its wavelength and harmonic resonance with the water molecule, to ensure the most efficient absorption by living tissues and effective heating by way of the agitation of water at the molecular level. The pulse-modulation of a wave with lower frequencies in addition to the high-frequency carrier signal, increases the exposure complexity and in turn the bioeffects in an exposed population.

8. In the context of school development, WI-FI exposes building occupants including children and adults constantly from both computers and infrastructure antennas. Duration may be an even more potent contributing factor to RF/MW radiation bioeffects than exposure levels. Chronic, such as all-day, school exposure, is more likely than short and intermittent exposure, such as cell phone use, to produce harmful health effects, and is likely to do so at lower exposure levels.

9. Persons stationed close to school computers with WI-FI and especially those very near to any WI-FI infrastructure will receive considerably higher exposure than do others.

10. It is generally accepted within the relevant scientific community and has been established beyond any reasonable doubt that adverse human health effects occur at far lower levels of RF/MW radiation exposure than those that cause noticeable heating, particularly where the wavelength approaches body-part size and thus maximizes absorption, where the wavelength has resonance with the water molecule, where there is more complex, modulated wave, where there is chronic exposure duration, and where exposed persons lack the capacity voluntarily to remove themselves from radiation sources.

11. Some effects are shown to occur at several hundred thousand times below the FCC public exposure guidelines, which are set based on the fallacious assumption that there are no adverse health effects at exposures that do not cause easily measureable heating. FCC guidelines

also only apply to 30-minute public exposures; therefore do not even infer safety at durations >30 minutes, such as in a school setting.

12. Exposure to high-frequency RF and MW radiation and also the extreme low frequency (ELF) EM fields that accompany WI-FI exposure have been linked to a variety of adverse health outcomes. Some of the many adverse effects reported to be associated with and/or caused by ELF fields and/or RF/MW radiation include neurologic, endocrine, immune, cardiac, reproductive and other effects, including cancers.

13. Studies of isolated cells have shown that RF/MW exposures may cause changes in cell membrane function, cell communication, metabolism, activation of proto-oncogenes, and can trigger the production of stress proteins at exposure levels below FCC guidelines and also at and less than school WI-FI exposure levels and parameters. Resulting effects in cellular studies include without limitation DNA breaks and chromosome aberrations, cell death including death of brain neurons, increased free radical production, activation of the endogenous opioid system, cell stress and premature aging.

14. Human studies of comparable RF/MW radiation parameters show changes in brain function including memory loss, retarded learning, performance impairment in children, headaches and neurodegenerative conditions, melatonin suppression and sleep disorders, fatigue, hormonal imbalances, immune dysregulation such as allergic and inflammatory responses, cardiac and blood pressure problems, genotoxic effects like miscarriage, cancers such as childhood leukemia, childhood and adult brain tumors, and more.

15. There is consistent evidence for increased incidence of effects in individuals who live near to high-power short-wave, AM, FM and TV transmission towers. This is particularly relevant because, like WI-FI, radio-TV transmission towers give continuous, whole-body radiation, not just radiation to the head, constantly.

16. Since WI-FI transmitters, both infrastructural and on computers, are indoors, where children and teachers may be very close by, and since WI-FI, at 2.45 GHz, deploys a

wavelength, at ~12.2 cm or ~ 4.8 inches, more absorbable by children's and adults' bodies and brains than radio-TV wavelengths, the harmfulness of WI-FI radiation likely exceeds that of radio-TV towers.

17. Like second-hand smoke, EMF and RF/MW radiation involve complex mixtures, where different frequencies, intensities, durations of exposure(s), modulation, waveform and other factors are known to produce variable effects, often more harmful with greater complexity. Decades of scientific study have produced substantial evidence that EMF and RF/MW radiation may be considered neurotoxic, carcinogenic and genotoxic. Sources of fields and radiation, but are not limited to: power lines, navigational radar, cell phones, cordless phones [or Digitally Encoded Cordless Transmission Devices (D.E.C.T.) phones], cell towers, 'smart' meters and their grids or infrastructure, "smart" boards, meters and grids, WiMax and wireless internet (WI-FI).

18. The RF/MW radiation and low-frequency EMF science that currently exists includes tens of thousands of studies dating back to the 1920s. On the basis of this vast body of literature, many public health experts believe, myself included, that it is likely society will face epidemics of neurotoxic effects and degeneration, cancers and genotoxicity in the future, resulting from the extreme and mostly involuntary exposure to RF/MW radiation and EMFs. WI-FI radiation in schools exceeds natural background levels of microwave radiation by trillions of times. Thus, it is important that all of us restrict our use of cell phones, and be as free as possible from exposure to unnatural, background sources of MW radiation, particularly WI-FI.

19. In public health science, it is generally accepted fact that vulnerable subgroups exist within any human population. This is also recognized specifically for RF/MW radiation and fields. These groups include children, pregnant women, the elderly and those with preexisting illnesses and/or impairments. Children are more vulnerable to RF/MW radiation because of the susceptibility of their developing nervous systems. RF/MW penetration is greater relative to head size in children, who have a greater absorption of RF/MW energy in the tissues of the head at WI-FI frequencies.

Such greater absorption results because children's skulls are thinner, their brains smaller, and their brain tissue is more conductive than those of adults, and since it has a higher water content and ion concentrations. The Presidential Cancer Panel found that children 'are at special risk due to their smaller body mass and rapid physical development, both of which magnify their vulnerability to known carcinogens, including radiation.'

http://deainfo.nci.nih.gov/advisory/pcp/annualReports/pcp08-09rpt/PCP_Report_08-09_508.pdf

20. FCC public RF/MW radiation exposure guidelines are based on the height, weight and stature of a 6-foot tall man, not children or adults of smaller stature. The guidelines do not take into account the unique susceptibility of growing children to exposures. Since children are growing, their rate of cellular activity and division is more rapid, and they are at more risk for DNA damage and subsequent cancers. Growth and development of the central nervous system is still occurring well into the teenage years, such that the neurological impairments predictable by the extant science may have great impact upon development, cognition, learning, and behavior. Prenatal exposure has been identified as a risk factor for childhood leukemia, and is associated with miscarriage. Children are largely unable to remove themselves from exposures to harmful substances in their environments. Their exposure is involuntary.

21. When WI-FI is in operation in a school, children and their parents have no choice but to allow the school to expose them to trillions of times higher microwave radiation than exists naturally on Earth at the same frequencies. Children and other building users are exposed to as much as 30-40 hours per week of constant, digitally encoded WI-FI signals from each wireless device and infrastructural antenna in a school building. Based upon a review of the Mount Tabor WI-FI Floor Plan, a given child is subject to direct signals from multiple WI-FI transmitters, including rooms full of students and teachers transmitting numerous laptop and other wireless signals. There is a major legal difference between an exposure that an individual chooses to accept and one that is forced upon a person, especially a dependent, who can do nothing about it.

22. WI-FI in the Portland Schools deploys similar PM MW radiation, at 2.45 and 5 GHz, to that of cell and cordless phones and their infrastructure. There is clear and strong evidence that intensive use of cell phones increases incidence of brain cancer, tumors of the auditory nerve, and cancer of the parotid gland, the salivary gland in the cheek by the ear. Cell and cordless phone radiation closely resembles that of WI-FI radiation exposure, except that WI-FI is more hazardous by way of frequency, duration, and the involuntary nature of exposure. While a cell or cordless phone is used only intermittently and primarily voluntarily, a WI-FI radiation microenvironment is constant in duration, with unavoidable radiation exposure even when nearby students are not actively using it. Because WI-FI radiation is essentially the same as, but more hazardous than, that for cell and cordless phones, there is every reason to understand that the health effects will be the same or worse, varying in relation to the total dose of radiation, and intensified by the constancy of duration. There is evidence from Scandinavian studies of cell phone usage that children who use cell phones are about five times more likely to develop brain cancer than if their usage starts as an adult. Thus, it is especially necessary to protect children from pulse-modulated MW radiation such as both cell phones and WI-FI deploy.

23. Based on a high degree of scientific certainty, Portland Public Schools' use of WI-FI is causing and will continue to cause AHM, other students, and school staff and faculty adverse health effects, and should be discontinued immediately. Educating by way of the Internet via cabled systems only decreases MW radiation exposure and is of minimal expense.

24. Having reviewed hundreds, possibly thousands, of studies in RF/MW radiation and ELF fields, published from decades ago to the present, I would provide you the following primary evidence, without limitation. Due to the active suppression of the RF/MW literature, some researchers in public health science are less aware of these studies. However, the forefront experts specializing in these areas, RF/MW radiation and ELF fields, recognize the certainties in this large body of scientific literature, which establishes without limitation that PM MW radiation with chronic duration is quite harmful to humans, particularly children, as well as to animals and plants.

25. It is not surprising that even as of 1990, the US Environmental Protection Agency ("EPA") had determined RF/MW radiation a "probable carcinogen". Now that we have much more confirming study in the interim, the conclusion is yet more certain. And when we focus on MW radiation, particularly pulse-modulated radiation, on long, non-intermittent duration and on more vulnerable subgroups such as children, we see that the cancer outcome is very certain, indeed. Amongst the epidemiologic studies showing cancer outcomes, the following are particularly strong:

- a. Dode AC, Leao M, Tejo FdeAF, gomes ACR, Dode DC, Dode MC, Moreira CW, Condessa VA, Albinatti C and Calaffa WT. Mortality by neoplasia and cellular telephone base stations in the Belo Horizonte municipality, Minas Gerais State, Brazil. *Sci Total Environ* 409: 3649-3665:2011. This study shows higher rates of cancer in people living close to cell phone towers than for people living further away. Cell phone radiation is similar to but likely not as harmful as 2.45 GHz radiation from WI-FI. The exposure levels in this study are lower than those that Portland school building occupants receive from WI-FI.
- b. Oberfeld G. Environmental Epidemiology Study of Cancer Incidence in the Municipalities of Hausmannstatten & Vasoldsberg (Austria), 2008. This government-commissioned study found significantly increased cancer risk relative to a lower-exposure reference category, 23x higher for breast cancer and 121x higher for brain tumors, with strong exposure-effect relations.
- c. Michelozzi P, Capon A, Kirchmayer U, Forastiere F, Biggeri A, Barca A and Perucci CA. Adult and childhood leukemia near a high-power radiostation in Rome, Italy. *Am J Epidemiol.* 155: 1098-1103: 2002. The authors show that there is a significant elevation of childhood leukemia among residents living near to Vatican Radio, and that the risk declines with distance away from the transmitter. This is RF radiation in frequencies similar to that of WI-FI.

- d. Ha M, Im H, Lee M, Kim HJ, Kim BC, Gimm YM and Pack JK. Radio-frequency radiation exposure from AM radio transmitters and childhood leukemia and brain cancer. *Am J Epidemiol* 166: 270-279: 2007. Leukemia and brain cancer in children in Korea were investigated in relation to residence within 2 km of AM radio transmitters. There was a significant elevation in rates of leukemia but not of brain cancer. WI-FI radiation is more harmful than AM.
- e. Park SK, Ha M, Im HJ. Ecological study on residences in the vicinity of AM radio broadcasting towers and cancer death: preliminary observations in Korea. *Int Arch Occup Environ Health*. 2004 Aug;77(6):387-94. This study found higher mortality areas for all cancers and leukemia in some age groups in the area near the AM towers.
- f. Hallberg O. Johansson O. *Med Sci Monit* 2004 Jul;10(7):CR336-40. Malignant melanoma of the skin – not a sunshine story! Increased incidence and mortality from skin melanoma are concluded to result from continuous disturbances of cell repair mechanisms by body-resonant EMFs from FM/TV networks.
- g. Hallberg O. Johansson O. 2005. FM Broadcasting exposure time and malignant melanoma incidence, *Electromagnetic Biology and Medicine* 24;1-8. Age-specific incidence of malignant melanoma of the skin is related to FM broadcasting radiation at whole-body resonant frequencies. This is very relevant to children, since the smaller wavelengths of WI-FI are at resonant frequencies with dimensions of the human head, particularly the child's head.
- h. Dolk H, Shaddick G, Walls P, Grundy C, Thakrar B, Kleinschmidt I, Elliot P. Cancer Incidence near radio and television transmitters in Great Britain. I – Sutton-Colfield transmitter, and II. Al high-power transmitters. *Am J Epidemiol* 1997; 145(1):1-9 and 10-17. In the first study, there was a statistically significant

increase in cancer; in the second, a small but significant increase in adult leukemia.

i. Hocking B, Gordon IR, Grain HL, Harfield GE. Cancer incidence and mortality and proximity to TV towers. *Medical J of Australia*. 165:601-605. At extremely low exposure levels, there was an association between increased childhood leukemia incidence and mortality and proximity to TV towers. TV radiation, in the VHF and UHF bands, is similar to but not as harmful as WI-FI radiation at 2.45 GHz.

j. Grayson JK. Radiation exposure, socioeconomic status, and brain tumor risk in the US Air Force: A nested case-control study. *Am J Epidemiol* 1996; 143:480-6. This study found an association between exposure to ELF and RF/MW radiation and brain tumors.

k. Szmigielski S. Cancer morbidity in subjects occupationally exposed to high frequency (radiofrequency and microwave) electromagnetic radiation. *Sci Total Environ* 1996;180:9-17. This study showed huge increases in leukemia and Non-Hodgkin's lymphomas. Though exposure levels are higher in this study than they would be with school WI-FI, it is possible that certain students or teachers stationed immediately next to the WI-FI infrastructure could receive comparable levels in radiation peaks.

26. Additional studies show neurologic, immune, endocrine, reproductive and cardiac, adverse health effects from low-dose, chronic exposure to RF/MW radiation in humans:

a. Papageorgiou CC, Hountala CD, Maganioti AE, Kyprianou MA, Rabavilas AD, Papadimitriou GN, Capsalis CN. Effects of WI-FI signals on the p300 component of event-related potentials during an auditory hayling task. *J Integr Neurosci* 2011 Jun;10(2):189-202. This study concludes that WI-FI exposure may exert gender-related alterations on neural activity.

- b. Altpeter ES, Roosli M et al. Effect of Short-wave magnetic fields on sleep quality and melatonin cycle in humans: The Schwarzenburg shut-down study. *Bioelectromagnetics* 27:142-150, 2006. Sleep quality improved and melatonin excretion increased when the transmitter was shut down.
- c. Abelin T et al. Sleep disturbances in the vicinity of the short-wave braodcast transmitter Schwarzenburg. *Somnologie* 9:203-209, 2005. There is strong evidence of a causal relationship between operation of a short-wave radio transmitter and sleep disturbances in the surrounding population.
- d. Hutter HP et al. Subjective symptoms, sleeping problems, and cognitive performance in subjects living near mobile phone base stations. *Occup Environ Med* 2006;63:307-313, 2006. There was a significant relation of some symptoms, especially headaches, to measured power density, as well as effects on wellbeing and performance.
- e. Preece AW, Georgious AG, Duunn EJ, Farrow SC. *Occup Environ Med* 2007 Jun;64(6):402-8. Compared to control village, there were highly significant differences in the reporting of migraine, headache and dizziness military and cell phone antenna systems.
- f. Buchner K, Eger, H. Changes of clinically important neurotransmitters under the influence of modulated RF fields – a long-term study under real-life conditions. *Umwelt-Medizin-Gesellschaft* 24(1):44-57, 2011. There is clear evidence of health-relevant effects, including increase in adrenaline/noradrenaline, subsequent decrease in dopamine from a new MW-emitting base station. During counterregulation, trace amine PEA decreased and remained decreased. Clinically documented increases in sleep problems, cephalgia, vertigo, concentration problems and allergies followed the onset of new microwave transmissions.

- g. Eliyahu I, Luria R, Hareuveny R, Margalioth M, Neiran N and Shani G . Effects of radiofrequency radiation emitted by cellular telephones on the cognitive functions of humans. *Bioelectromagnetics* 27: 119-126: 2006. A total of 36 human subjects were exposed to PM MW and were tested on four distinct cognitive tasks. Exposure to the left side of the brain slows left-hand response time in three of the four tasks.
- h. Barth A, Winker R, Ponocny-Seliger E, Mayrhofer W, Ponocny I, Sauter C and Vana N. *Occup Environ Med* 65: 342-345: 2008. A meta-analysis for neurobehavioural effects due to electromagnetic field exposure emitted by GSM mobile phones. The authors looked at 19 studies of cognitive function in cell phone users, and found in the meta-analysis that there is evidence for a decreased reaction time, altered working memory and increased number of errors in exposed persons.
- i. Augner C, Hacker GW, Oberfeld G, Florian M, Hitzl W, Hutter J and Pauser G. Effects of exposure to base station signals on salivary cortisol, alpha-amylase and immunoglobulin A. *Biomed Environ Sci* 23: 199-207: 2010. This was a human experimental study with exposure to PM MW radiation wherein immune indicators were monitored after five 50-minute sessions. The researchers found dose-dependent changes in cortisol and alpha-amylase.
- j. Avendano C, Mata A, Sanchez Sarimiento CA and Doncel GF. Use of laptop computers connected to internet through WI-FI decreases human sperm motility and increases sperm DNA fragmentation. *Fert Steril*, 2012, In press. In this study human sperm were exposed to WI-FI from a laptop, and were found to show reduced motility after a 4-hour exposure. The results are consistent with other publications (see Agarwal et al., *Fert Steril* 89: 124-128: 2008) that reported that those who use cell phone regularly have reduced sperm count.

k. Baste V, Riise T and Moen BE (2008) *Int J Epidemiol* 23: 369-377: 2008. Radiofrequency electromagnetic fields: male infertility and sex ratio of offspring. This is a study of Norwegian Navy personnel chronically exposed to RF fields on the job. The rates of infertility were related to level of exposure in a dose-dependent fashion.

27. Many toxicologic and other animal studies, of which the following are but a few, support conclusions of cancer, genotoxicity, neurotoxicity and other health outcomes from RF/MW radiation.

a. Sinha R. Chronic non-thermal exposure of modulated 2450 MHz microwave radiation alters thyroid hormones and behavior of male rats. *Int. J. Radiation Biol.* 84:6:505-513, 2008. This study of 2.45 GHz at levels and durations comparable to and less than those of school WI-FI concluded that the radiation was sufficient to alter the levels of thyroid hormone as well as emotional reactivity compared to controls.

b. Nittby H, Grafstrom G, Tian DP, Malmgren L, Brun A, Persson BRR, Salfors LG and Eberhardt J. *Bioelectromagnetics* 29: 219-232: 2008. This study showed cognitive impairment in rats after long-term exposure to PM MW radiation. This study of rats shows that after 2 hours per week for 55 weeks there was impaired memory for objects in exposed as compared to sham animals.

c. Kimmel S et al. Electromagnetic radiation: Influences on honeybees (*Apis mellifera*). A significant difference between non-exposed and fully irradiated bees was the result of the influence of high-frequency PM RF/MW radiation.

d. Panagopoulos DJ et al. Bioeffects of mobile telephony radiation in relation to its intensity or distance from the antenna. *Int. J Radiat Biol*, 86;(5):345-357, 2010. The PM MW radiations at 900 and 1800 MHz decreased the reproductive capacity by cell death induction, with an increased bioactivity "window" at 10

uW/cm², and still evident down to 1 uW/cm².

e. Everaert J, Bauwens D. A possible effect of electromagnetic radiation from mobile phone base stations on the number of breeding house sparrow (*passer domesticus*). *Electromagnetic Biology and Medicine*, 26:63-72, 2007.

Long-term exposure to higher-level low-intensity PM MW radiation negatively affects the abundance or behavior of House Sparrows in the wild.

f. Magras I, Xenos T. RF Radiation-Induced Changes in the Prenatal Development of Mice. *Bioelectromagnetics* 18:455-461, 1997. Near almost 100 TV and FM broadcast transmitters, with exposure levels between 0.168 uW/cm² and 1.053 uW/cm², found in the more exposed groups testicular damage and decreasing size of litters to irreversible infertility.

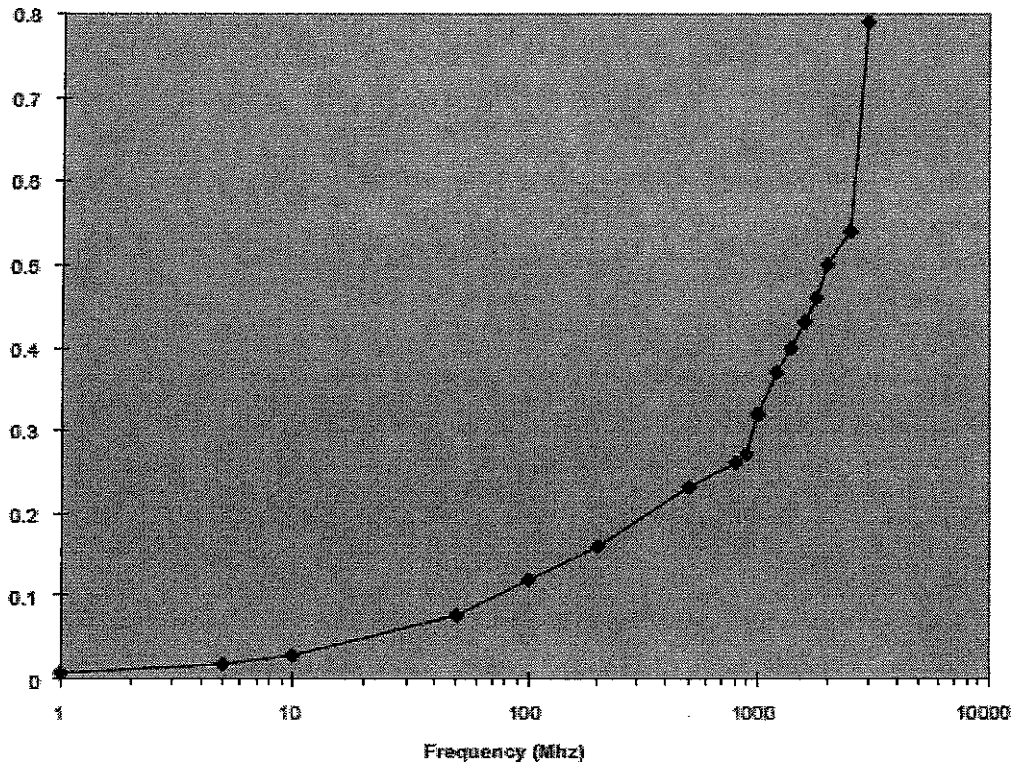
g. Balmori A. Electromagnetic pollution from phone masts. Effects on wildlife, *Pathophysiology* 2009. This large review of wildlife effects concludes, “pulsed telephony microwave radiation can produce effects on nervous, cardiovascular, immune and reproductive systems,” including damage to the nervous system by altering EEG and changes to the blood-brain barrier, disruption of the circadian rhythms (sleep-wake) by interfering with the pineal gland and hormonal imbalances, changes in heart rate and blood pressure, impairment of health and immunity towards pathogens, weakness, exhaustion, growth problems, problems in building the nest or impaired fertility, embryonic development, hatching percentage, genetic and developmental problems, problems of locomotion, promotion of tumors and more.

28. Exposure thresholds for harmful effects are lowered in human populations and individuals when duration is increased. Due to the variability of thresholds for harmful effects both in the population and within the individual, there is no exposure power density that is safe. The School's WI-FI deploys arguably the worst possible frequency of 2.45 GHz, that of the

microwave oven, worst because it is most absorbable by the brain and most resonant with the water molecule, such that:

- a. absorption-per-exposure is maximized, dramatically lowering effects thresholds for population and individual effects; and
- b. water molecules in tissues and cells are highly agitated.

Microwave Absorption in Brain Tissue (Grey Matter)



Curry, Ph.D., *Wireless LANs in the schoolroom*

29. This above graph, from physicist William Curry PhD's presentation *Wireless LANs in the Schoolroom*, shows how absorption in brain tissue (grey matter) increases exponentially toward the ultra-high frequency (UHF) area of the microwave oven and WI-FI.

30. In the case of the Portland Schools, the additional, unused but still deployed carrier frequency of 5 GHz would likely increase absorption in other, smaller organs, such as the thyroid.

31. The graph also illustrates the problem with the drive of the wireless industry toward ever higher frequencies within the cm microwave band. While nearly all the lower frequency bands have already been allocated by the FCC for specific types of radio transmissions, and transmission of ever more information content on any given channel requires greater bandwidth, each new deployment undermines further the integrity of the population's health. Engineers who design these systems have no training that would qualify them to consider the effects on biologic systems, which is why public health scientists need to be called in to policymaking *prior to* contracting and deployment, not after the fact.

32. The following studies explain the mechanisms of interaction between RF/MW radiation and biologic systems at the cellular level.

- a. The cell membrane recognition process -- which includes signal transduction and 'heat-shock protein' release -- was first discerned by Litovitz and his co-workers at Catholic University of America in the mid-1990s.

Below are a few citations that make the point.

- i. Litovitz, T., C. Montrose, et al. (1994). "Superimposing spatially coherent electromagnetic noise inhibits field induced abnormalities in developing chick embryos." *Bioelectromagnetics* 15(2): 105-113.
- ii. DiCarlo, A., J. Farrell, et al. (1998). "A simple experiment to study electromagnetic field effects: Protection induced by short term exposures to 60 Hz magnetic fields." *Bioelectromagnetics* 19(8): 498-500.
- iii. Penafiel, L., T. Litovitz, et al. (1997). "Role of modulation on the effect of microwaves on ornithine decarboxylase activity in L929

- cells." *Bioelectromagnetics* **18**(2): 132-141.
- iv. Dicarlo, A. L., Michael T. Hargis, L. Miguel Penafiel, Theodore A. Litovitz, A. (1999). "Short-term magnetic field exposures (60Hz) induce protection against ultraviolet radiation damage." *International journal of radiation biology* **75**(12): 1541-1549.
 - v. Litovitz, T., C. Montrose, et al. (1990). "Amplitude windows and transiently augmented transcription from exposure to electromagnetic fields." *Bioelectromagnetics* **11**(4): 297-312.
 - vi. Litovitz, T., M. Penafiel, et al. (1997). "The role of temporal sensing in bioelectromagnetic effects." *Bioelectromagnetics* **18**(5): 388-395.
 - vii. Litovitz, T., L. Penafiel, et al. (1997). "Role of modulation in the effect of microwaves on ornithine decarboxylase activity in L929 cells." *Bioelectromagnetics* **18**: 132-141.]
 - viii. Litovitz, T., D. Krause, et al. (1993). "The role of coherence time in the effect of microwaves on ornithine decarboxylase activity." *Bioelectromagnetics* **14**(5): 395-403.
- b. Cell membrane reaction is lipid peroxidation.
 - i. Serban, M. and V. Ni (1994). "Lipid peroxidation and change of plasma lipids in acute ischemic stroke." *Romanian journal of internal medicine= Revue roumaine de médecine interne* **32**(1): 51.

- ii. Vileno, B., S. Jeney, et al. (2010). "Evidence of lipid peroxidation and protein phosphorylation in cells upon oxidative stress photo-generated by fullerols." *Biophysical chemistry*.
 - iii. Maaroufi, K., E. Save, et al. (2011). "Oxidative stress and prevention of the adaptive response to chronic iron overload in the brain of young adult rats exposed to a 150 kilohertz electromagnetic field." *Neuroscience*.
 - iv. Nelson, S. K., S. K. Bose, et al. (1994). "The toxicity of high-dose superoxide dismutase suggests that superoxide can both initiate and terminate lipid peroxidation in the reperfused heart." *Free Radical Biology and Medicine* **16**(2): 195-200.
 - v. Alvarez, J. G. and B. T. Storey (1989). "Role of glutathione peroxidase in protecting mammalian spermatozoa from loss of motility caused by spontaneous lipid peroxidation." *Gamete research* **23**(1): 77-90.
 - vi. Devasagayam, T., K. Bloor, et al. (2003). "Methods for estimating lipid peroxidation: An analysis of merits and demerits." *Indian journal of biochemistry & biophysics* **40**(5): 300-308.
- c. Free-Radical Damage:
- i. Ozgur, E., G. Güler, et al. (2010). "Mobile phone radiation-induced free radical damage in the liver is inhibited by the antioxidants n-acetyl cysteine and epigallocatechin-gallate." *International journal of radiation biology*(00): 1-11.

- ii. Gutteridge, J. and X. C. Fu (1981). "Enhancement of bleomycin-iron free radical damage to DNA by antioxidants and their inhibition of lipid peroxidation." *FEBS letters* **123**(1): 71.
- d. mRNA:
 - i. Yan, J. G., M. Agresti, et al. (2009). "Qualitative Effect on mRNAs of Injury-Associated Proteins by Cell Phone Like Radiation in Rat Facial Nerves." *Electromagnetic Biology and Medicine* **28**(4): 383-390.
 - ii. Yan, J. G., M. Agresti, et al. (2008). "Upregulation of specific mRNA levels in rat brain after cell phone exposure." *Electromagnetic Biology and Medicine* **27**(2): 147-154.
 - iii. Simbürger, E., A. Stang, et al. (1997). "Expression of connexin43 mRNA in adult rodent brain." *Histochemistry and cell biology* **107**(2): 127-137.
 - iv. Chen, J., H. C. He, et al. (2010). "Effects of Pulsed Electromagnetic Fields on the mRNA Expression of RANK and CAII in Ovariectomized Rat Osteoclast-Like Cell." *Connective Tissue Research* **51**(1): 1-7.
- e. Epigenetic changes.... environmentally induced genetic change:
 - i. Migliore, L. and F. Copped (2009). "Genetics, environmental factors and the emerging role of epigenetics in neurodegenerative diseases." *Mutation Research/Fundamental and Molecular*

Mechanisms of Mutagenesis 667(1-2): 82-97.

- ii. Currenti, S. (2009). "Understanding and Determining the Etiology of Autism." *Cellular and Molecular Neurobiology* 30(2): 161-171.
- f. Micronuclei formation:
 - i. Tice, R. R., G. G. Hook, et al. (2002). "Genotoxicity of radiofrequency signals. I. Investigation of DNA damage and micronuclei induction in cultured human blood cells." *Bioelectromagnetics*, 23(2): 113-126.
 - ii. Lerchl, A. (2009). "Comments on "Radiofrequency electromagnetic fields (UMTS, 1,950 MHz) induce genotoxic effects in vitro in human fibroblasts but not in lymphocytes" by Schwarz et al. (Int Arch Occup Environ Health 2008: doi: 10.1007/s00420-008-0305-5)." *Int Arch Occup Environ Health* 82(2): 275-278.
 - iii. Vijayalaxmi and T. J. Prihoda (2009). "Genetic damage in mammalian somatic cells exposed to extremely low frequency electro-magnetic fields: a meta-analysis of data from 87 publications (1990-2007)." *Int J Radiat Biol* 85(3): 196-213.
 - iv. Sannino, A., M. Sarti, et al. (2009). "Induction of adaptive response in human blood lymphocytes exposed to radiofrequency radiation." *Radiat Res* 171(6): 735-742.
- g. DNA repair disruption:
 - i. Brusick, D., R. Albertini, et al. (1998). "Genotoxicity of radiofrequency radiation. DNA/Genetox Expert Panel." *Environ*

Mol Mutagen 32(1): 1-16.

- ii. Belyaev, I. Y., E. Markova, et al. (2009). "Microwaves from UMTS/GSM mobile phones induce long-lasting inhibition of 53BP1/gamma-H2AX DNA repair foci in human lymphocytes." *Bioelectromagnetics* 30(2): 129-141.
- iii. Sun, L. X., K. Yao, et al. (2006). "[Effect of acute exposure to microwave from mobile phone on DNA damage and repair of cultured human lens epithelial cells in vitro]." *Zhonghua Lao Dong Wei Sheng Zhi Ye Bing Za Zhi* 24(8): 465-467.
- h. Immune response suppression:
 - i. Lyle, D. B., P. Schechter, et al. (1983). "Suppression of T-lymphocyte cytotoxicity following exposure to sinusoidally amplitude-modulated fields." *Bioelectromagnetics* 4(3): 281-292.
 - ii. Elekes, E., G. Thuroczy, et al. (1996). "Effect on the immune system of mice exposed chronically to 50 Hz amplitude-modulated 2.45 GHz microwaves." *Bioelectromagnetics* 17(3): 246-248.
 - iii. DABALA, D., D. SURCEL, et al. (2008). "Oxidative and Immune Response in Experimental Exposure to Electromagnetic Fields." *Electromagnetic field, health and environment: proceedings of EHE'07*: 105.
 - iv. Surcel, D., D. Dabala, et al. (2009). "Free Radicals, Lipid Peroxidation and Immune Response in Experimental Exposure to Electromagnetic Fields." *Epidemiology* 20(6): S118.

Conclusions

33. To understand the seriousness of this Agent of PM RF/MW radiation in interaction with populations and individuals, we need to consider some basic facts in addition to the many relevant and reliable studies above. For example, where shortwave, AM, FM, TV and cell phone infrastructure frequencies are demonstrated to be harmful, as they consistently are shown to be at low intensities with long duration, then, all other factors being equal, MW radiation at 2.45 GHz will likely be more harmful yet, due to its higher absorption-per-exposure and water molecule resonance. Increasing the constancy and length of exposure toward the maximum of occupational and 24-7 durations will lower the threshold for effects in populations and individuals. Complex radiation microenvironments with pulse-modulated wave and multiple sources, such as are deployed in WI-FI-equipped schools, are more harmful than a single, isolated MW radiation exposure at the same power density and duration. There are only a few of the many studies of RF/MW radiation infrastructure such as base stations that fail to show their studied effect. However, even were the reverse true, i.e., if there existed greater number than those that do show adverse effects, it is the case that positive studies (those that show adverse effects) hold more weight than negative studies (those that show no effect).

34. The FCC-appointed guideline-setting Commission, ASTM-IEEE, in 1991 referred in its conclusions to RF/MW radiation, the Agent, as a 'Hazard,' specifically setting a 'Hazard Threshold.' It has been discovered that, even amongst the 120 studies chosen by the Committee to prove the validity of its Hazard Threshold, there were 15 studies that concluded adverse effects at levels *lower* than the Hazard Threshold, thus disproving its validity. Three of these studies actually showed adverse effects at less than 10 percent of the Hazard Threshold. Thus the guidelines have no credibility.

35. The large body of scientific literature moreover redundantly proves this Agent to be a hazard. The media-promulgated notion that the relevant scientific studies are inconsistent and inconclusive is false and misleading. Chronic exposure to PM MW radiation harms every individual in a population in some ways, even if these are not always detectable by the individual or consciously attributed to the responsible RF/MW radiation sources. This Agent injures some individuals into a condition in which symptoms will be more easily retriggered with subsequent exposure. And for *a priori* susceptible individuals and those using electronic medical devices, it can respectively exacerbate the extant medical conditions and disrupt medical device operation, even to the point of death. Bassen 1997 discusses the hundreds of excess deaths, even at that time, from wireless communications radiation. See also *Radiofrequency Interference with Medical Devices*, IEEE Engineering in Medicine and Biology Magazine 17(3):111-114(1998), <http://ewh.ieee.org/soc/embs/comar/interfer.htm>.

36. For these reasons, WI-FI must be banned from school deployment.

37. I will receive no compensation for my testimony beyond out-of-pocket expenses.

Dated this 20th day of December, 2011.



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Director, Institute for Health and the Environment
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CURRICULUM VITAE

Name: David O. Carpenter

Home Address: 2749 Old State Road
Schenectady, New York 12303

Positions Held:

Director, Institute for Health and the Environment
University at Albany
Professor, Environmental Health Sciences
School of Public Health, University at Albany
5 University Place, A217, Rensselaer, NY 12144

Education: 1959 B.A., Harvard College, Cambridge, MA
1964 M.D., Harvard Medical School, Boston, MA

Positions Held:

- 9/61-6/62 Research Fellow, Department of Physiology, University of Göteborg, Sweden with Professor Anders Lundberg
 - 7/64-6/65 Research Associate, Department of Physiology, Harvard Medical School, Boston, MA under the direction of Dr. Elwood Henneman
 - 7/65-2/73 Neurophysiologist, Laboratory of Neurophysiology, National Institutes of Mental Health, Dr. Edward V. Evarts, Chief, Assistant Surgeon, USPHS, currently a Reserve Officer in the USPHS.
 - 2/73-3/80 Chairman, Neurobiology Department Armed Forces Radiobiology Research Institute, Defense Nuclear Agency, Bethesda, MD
 - 3/80-9/85 Director, Wadsworth Center for Laboratories and Research, New York State Department of Health, Albany, NY
 - 9/85-1/98 Dean, School of Public Health, University at Albany
 - 9/85-Pres. Professor, Departments of Environmental Health Sciences and Biomedical Sciences, School of Public Health, University at Albany.
 - 9/85-7/98 Research Physician, Wadsworth Center for Laboratories and Research, New York State Department of Health, Albany, NY
 - 1/98-1/05 Adjunct Professor in the Center for Neuropharmacology & Neuroscience, Albany Medical College, Albany, NY
 - 2001-Pres. Director, Institute for Health and the Environment, University at Albany, SUNY, Rensselaer, NY. The Institute was named a Collaborating Center of the World Health Organization in 2011.
 - 2005-Pres. Senior Fellow, Alden March Bioethics Institute, Albany Medical College/Center, Albany, New York
- Editor-in-Chief:** Cellular and Molecular Neurobiology, 1981 - 1987
Editorial Advisor: Cellular and Molecular Neurobiology, 1987 - Present
Editorial Boards: Journal of Public Health Management and Practice, 1995 - 2002
International Journal of Occupational Medicine & Environmental Health
1996 - Present

Journal of Alzheimer's Disease – Associate Editor, 2007-2009
Reviews in Environmental Health; 2008-present
International Archives of Occupational and Environmental Health; 2009-present.
Journal of Environmental and Public Health, 2009-present.
Environmental Health Perspectives, 2010-present

National and International Committees:

- 1978, 1981 Physiology Study Section (Ad hoc member)
- 1979-1985 NIH International Fellowship Study Section
- 1974-1981 Member, Steering Committee of the Section on the Nervous System, American Physiological Society (Chairman of the Committee, 9/76-4/80)
- 1981-1989 Member, USA National Committee for the International Brain Research Organization
- 1985-1986 Committee on Electric Energy Systems of the Energy Engineering Board, National Research Council
- 1986-1987 Member, Neurophysiology Peer Panel for the National Aeronautics and Space Administration
- 1987-1989 Member, Science Advisory Council of the American Paralysis Association
- 1987-1990 Advisory Panel for the Electric Energy System Division, U.S. Department of Energy
- 1985-1993 Committee #79, National Council on Radiation Protection and Measurements
- 1986-1997 Member, Legislative and Education Committees, Association of Schools of Public Health
- 1989-1994 Member, Neuroscience Discipline Working Group, Life Sciences Division of the NASA
- 1994, 1995 Federation of American Societies for Experimental Biology Consensus Conference on FY 1995 Federal Research Funding
- 1994-1997 Member, Legislative Committee of the Association of Schools of Public Health
- 1997 Member, Executive Committee of the Association of Schools of Public Health
- 1997-2000 National Advisory Environmental Health Sciences Council of the National Institutes of Health
- 1998-Pres. Member, U.S. Section of the Great Lakes Science Advisory Board of the International Joint Commission
- 2000-Pres. Member, Board of Directors, Pacific Basin Consortium for Hazardous Waste Health and Environment; Treasurer, 2001-2004, 2008-pres; Chair, 2004-2008
- 2001-2008 United States Co-Chair, Workgroup on Ecosystem Health of the Science Advisory Board of the International Joint Commission
- 2002-2003 Member, Committee on the Implications of Dioxin in the Food Supply, The National Academies, Institute of Medicine
- 2003-2008 Member, United States Environmental Protection Agency, Children's Health Protection Advisory Committee
- 2003-Pres. Chair, Advisory Committee to the World Health Organization and National Institute of Environmental Health Sciences on collaborative activities.
- 2007-2011 Chair, Workgroup on Risks vs. Benefits of Fish Consumption, Science Advisory Board, International Joint Commission.

State and Local Committees:

- 1980-1987 Executive Secretary, New York State Power Lines Project
- 1985-1989 Board of Scientific Advisors, Institute of Basic Research, OMRDD, N.Y.
- 1986-1989 Member, Steering Committee, Health Policy and Administrative Consortium of the Capital District
- 1991-1992 Member, Connecticut Academy of Sciences and Engineering Committee on Electromagnetic Field Health Effects
- 1991-1992 Member, Board of Directors of the Capital District Chapter of the Alzheimer's Disease and Related Disorders Association, Inc.
- 1991-1992 Member, State Task Force for the Reform of Middle Level Education in NY State
- 1992-1993 Member, State Needs Task Force on Health Care and Education
- 1987-1998 Delegate-at-Large, New York State Public Health Association
- 1991-1995 Member, Board of Directors of the Capital District Amyotrophic Lateral Sclerosis Association
- 1994 Chair, Council of Deans, University at Albany, SUNY
- 1997-2008. Member, Board of Directors, (Chair 1998-2004) Albany-Tula Inc.: A Capital Region Alliance
- 2000-Pres. Member, Board of Directors, Healthy Schools Network, Inc.
- 2000-2003 Member, Medical Advisory Board, Hepatitis C Coalition, New York
- 2000-2004 Member, Environmental Protection Agency /National Association of State Universities and Land Grant Colleges Task Force
- 2001-2008 Member, Board of Directors, Environmental Advocates of New York
- 2004-2007 Member, Ad Hoc Advisory Group on Brownfield Cleanup Standards
- 2005-Pres. Member, Schooling Chefs Curriculum Advisory Board
- 2005-2008 Member, Board of Directors, Citizens Environmental Coalition
- 2006-2009 Member, Board of Directors, Marine Environmental Research Institute
- 2007-2009 Member, New York State Renewable Energy Task Force

Honors, Awards and Fellowships:

- 1959 B.A. awarded *magna cum laude*. Thesis entitled "Metamorphosis of visual pigments: A study of visual system of the salamander, *Ambystoma tigrinum*" (Thesis advisor, Professor George Wald)
Elected to Phi Beta Kappa and to Sigma Xi
- 1964 M.D. awarded *cum laude* for a thesis in a special field. Thesis entitled "Electrophysiological observations on the importance on neuron size in determining responses to excitation and inhibition in motor and sensory systems" (Thesis advisor, Dr. Elwood Henneman)
- 1964 Awarded the Leon Resnick Prize given to a Harvard Medical School graduate showing promise in research
- 1970 Awarded the Moseley Traveling Fellowship for study in England (Fellowship declined)
- 1971 Invited as Visiting Professor of Physiology, Centro de Investigacion y de Estudios Avanzados, del Institute Politecnico Nacional, Mexico 14, D.F., Mexico, for 3 months

- 1982, 1986 Visiting Professor of Physiology, Department of Physiology, Kyushu
- 1987 University, Fukuoka, Japan, for a period of three months each
- 1989 Awarded Jacob Javits Neuroscience Investigator Award from the National Institute of Neurological and Communicative Diseases and Stroke
- 1999 Awarded Homer N. Calver Award from the American Public Health Association for studies in environmental health.
- 2001 Awarded 2001 Academic Laureate from the University at Albany Foundation.
- 2010 Awarded the Albion O. Bernstein, M.D. Award in recognition of an outstanding contribution to public health and the prevention of disease through lifelong research of environmental health hazards and for limitless devotion to medical education by the Medical Society of the State of New York.

Federal Grants Held: (Principal Investigator Only)

- 1980-1983 United States Air Force, "Mechanisms of Radiation-Induced Emesis in Dogs", \$76,847 total direct costs.
- 1982-1988 National Institute of Health, "Mechanisms of Desensitization at Central Synapses", \$464,786 total direct costs.
- 1984-1986 Defense Nuclear Agency, "Mechanisms of Radiation-Induced Emesis in Dogs", \$330,504 total direct costs.
- 1986-1996 National Institute of Health, "Mechanisms of Excitatory Amino Acids Actions and Toxicity", 1986-1989 \$231,848 total direct costs; 1990-1996 \$562,926 total direct costs.
- 1989-1993 National Institute of Health, "Mechanisms of Lead Neurotoxicity" \$373,576 total direct costs
- 1990-1995 National Institute of Environmental Health Sciences, Superfund Basic Research Program, "Multidisciplinary Study of PCBs and PCDFs at a Waste Site", D.O. Carpenter, P.I. \$5,783,419 total direct costs.
- 1995-2001 Fogarty International Center, National Institutes of Health, International Training Program in Environmental and Occupational Health. A Central/Eastern European Environ/Occup Training Program, D.O. Carpenter, P.I. \$657,520 total costs.
- 1995-2001 National Institute of Environmental Health Sciences, Superfund Basic Research Program, "Multidisciplinary Study of PCBs," D.O. Carpenter, P.I. \$12,653,709 total direct costs.
- 1998-1999 Environmental Protection Agency, A Indoor Air Risk at Akwesasne - Pilot Project, D.O. Carpenter, P.I. \$9,996 total costs.
- 2000-2002 Association Liaison Office for University Cooperation in Development, A Cooperative Program in Environmental Health between the Institute of Public Health at Makerere University, Kampala, Uganda and the School of Public Health, University at Albany, USA, D.O. Carpenter, P.I. \$96,432 total costs.
- 2001-2007 Fogarty International Center, National Institutes of Health, International Training Program in Environmental and Occupational Health. A Multidisciplinary Environmental Health Training, D.O. Carpenter, P.I. \$850,000 total costs.
- 2006-2011 Pakistan-US Science and Technology Cooperative Program (US National Academy of Sciences). "Association of particulate matter with daily morbidity in

- an urban population,” D.O. Carpenter, P.I., \$391,104 total costs.
- 2009-2013 Exploratory Center on Minority Health and Health Disparities in Smaller Cities. Project 2: Environmental contaminants and reproductive health of Akwesasne Mohawk women. \$387,825 for year 1. D.O. Carpenter, Co-PI.
- 2010-2013 Department of the Army, “Gulf War Illness: Evaluation of an Innovative Detoxification Program: D.O. Carpenter, P.I., \$636,958 total costs.
- 2010-2013 Higher Education for Development of the United States Agency for International Development, “Drinking Water Supply, Sanitation, and Hygiene Promotion : Health Interventions in Two Urban Communities of Kampala City and Mukono Municipality, Uganda”. D. O. Carpenter, P.I., \$299,736 total costs.
- 2011-2016 National Institute of Environmental Health Sciences (1R01ES019620), “Protecting the health of future generations: Assessing and preventing exposures.” PK Miller, FA von Hippel, CL Buck and DO Carpenter, Co-P.I.s, \$471,521 for the period 8/08/11-4/30/12, \$2,354,871 for the period 2011-2016.

Research Interests:

- Exposure to persistent organic pollutants and risk of diabetes, cardiovascular disease, and hypertension.
- Cognitive and behavioral effects of environmental contaminants on children (IQ, ADHD) and older adults (dementias, Parkinson’s Disease and ALS).
- Ionizing and non-ionizing radiation biology.
- Effects of air pollution on respiratory and cardiovascular function.

Other Professional Activities:

Host, The Public Radio Health Show (a 30 min public health information show carried on 170+ stations nationwide), plus the Armed Forces Radio Network and Voice of America, 1985-2001. Authored a biweekly health column in The Troy Record, a local newspaper, 1997-1999.

Major Peer-Reviewed Publications:

1. Carpenter, D.O., Lundberg, A. and Norrsell, U. Effects from the pyramidal tract on primary afferents and on spinal reflex actions to primary afferents. *Experientia*, 18:337, 1962.
2. Carpenter, D.O., Engberg, I. and Lundberg, A. Presynaptic inhibition in the lumbar cord evoked from the brain stem. *Experientia*, 18:450, 1962.
3. Carpenter, D.O., Lundberg, A. and Norrsell, U. Primary afferent depolarization evoked from the sensorimotor cortex. *Acta Physiol. Scand.*, 59:126-142.
4. Carpenter, D.O., Engberg, I., Funkenstein, H. and Lundberg, A. Decerebrate control of reflexes to primary afferents. *Acta Physiol. Scand.*, 59:424-437, 1963.
5. Carpenter, D.O., Engberg, I. and Lundberg, A. Differential supraspinal control of inhibitory and excitatory actions from the FRA to ascending spinal pathways. *Acta Physiol. Scand.*, 63:103-110, 1965.

6. Henneman, E., Somjen, G.G. and Carpenter, D.O. Excitability and inhibibility of motoneurons of different sizes. *J. Neurophysiol.*, 28:599-620, 1965.
7. Henneman, E., Somjen, G.G. and Carpenter, D.O. Functional significance of cell size in spinal motoneurons. *J. Neurophysiol.*, 28:560-580, 1965.
8. Somjen, G.G., Carpenter, D.O. and Henneman, E. Selective depression of alpha motoneurons of small size by ether. *J. Pharmacol.*, 148:380-385, 1965.
9. Somjen, G., Carpenter, D.O. and Henneman, E. Response of motoneurons of different sizes to graded stimulation of supraspinal centers of the brain. *J. Neurophysiol.*, 28:958-965, 1965.
10. Carpenter, D.O., Engberg, I. and Lundberg, A. Primary afferent depolarization evoked from the brain stem and the cerebellum. *Arch. Ital. Biol.*, 104:73-85, 1966.
11. Carpenter, D.O. and Henneman, E. A relation between the threshold of stretch receptors in skeletal muscle and the diameter of axons. *J. Neurophysiol.*, 29:353-368, 1966.
12. Carpenter, D.O. Temperature effects on pacemaker generation, membrane potential, and critical firing threshold in *Aplysia* neurons. *J. Gen. Physiol.*, 50:1469-1484, 1967.
13. Chase, T.N., Breese, G., Carpenter, D., Schanberg, S. and Kopin, I. Stimulation-induced release of serotonin from nerve tissue. *Adv. Pharmacol.*, 6A:351-364, 1968.
14. Carpenter, D.O. and Alving, B.O. A contribution of an electrogenic Na⁺ pump to membrane potential in *Aplysia* neurons. *J. Gen. Physiol.*, 52:1-21, 1968.
15. Olson, C.B., Carpenter, D.O. and Henneman, E. Orderly recruitment of muscle action potentials. *Arch. Neurol.*, 19:591-597, 1968.
16. Carpenter, D.O. Membrane potential produced directly by the Na⁺ pump in *Aplysia* neurons. *Comp. Biochem. Physiol.*, 35:371-385, 1970.
17. Carpenter, D.O. and Gunn, R. The dependence of pacemaker discharge of *Aplysia* neurons upon Na⁺ and Ca⁺⁺. *J. Cell. Physiol.*, 75:121-127, 1970.
18. Kraus, K.R., Carpenter, D.O. and Kopin, I. R. Acetylcholine-induced release of norepinephrine in the presence of tetrodotoxin. *J. Pharmacol. Exp. Therap.*, 73:416-421, 1970.
19. Barker, J.L. and Carpenter, D.O. Thermosensitivity of neurons in the sensorimotor cortex of the cat. *Science*, 169:597-598, 1970.
20. Carpenter, D.O., Hovey, M.M. and Bak, A. Intracellular conductance of *Aplysia* neurons and squid axon as determined by a new technique. *Int'l. J. Neurosci.*, 2:35-48, 1971.
21. Carpenter, D.O., Breese, G., Schanberg, S. and Kopin, I. Serotonin and dopamine: Distribution and accumulation in *Aplysia* nervous and non-nervous tissues. *Int'l. J. Neurosci.*, 2:49-56, 1971.
22. Hovey, M.M., Bak, A.F. and Carpenter, D.O. Low internal conductivity of *Aplysia* neuron somata. *Science*, 176:1329-1331, 1972.
23. Carpenter, D.O. Electrogenic sodium pump and high specific resistance in nerve cell bodies of the squid. *Science*, 179:1336-1338, 1973.
24. Carpenter, D.O. and Rudomin, P. The organization of primary afferent depolarization in the isolated spinal cord of the frog. *J. Physiol. (Lond.)*, 229:471-493, 1973.
25. Shain, W., Green, L.A., Carpenter, D.O., Sytkowski, A.J. and Vogel, Z. *Aplysia* acetylcholine receptors: Blockage by and binding of α -bungarotoxin. *Brain Res.*, 72:225-240, 1974.
26. Pierau, Fr.-K., Torrey, P. and Carpenter, D.O. Mammalian cold receptor afferents: Role of an electrogenic sodium pump in sensory transduction. *Brain Res.*, 73:156-160, 1974.

27. Saavedra, J.M., Brownstein, M.J., Carpenter, D.O. and Axelrod, J. Octopamine: Presence in single neurons in *Aplysia* suggests neurotransmitter function. *Science*, 185:364-365, 1974.
28. Willis, J.A., Gaubatz, G.L. and Carpenter, D.O. The role of the electrogenic sodium pump in modulation of pacemaker discharge of *Aplysia* neurons. *J. Cell. Physiol.*, 84:463-472, 1974.
29. Brownstein, M.J., Saavedra, J.M., Axelrod, J., Zeman, G.H. and Carpenter, D.O. Coexistence of several putative neurotransmitters in single identified neurons of *Aplysia*. *Proc. Natl. Acad. Sci. (USA)*, 71:4662-4665, 1975.
30. Carpenter, D.O. and Gaubatz, G.L. Octopamine receptors on *Aplysia* neurons mediate hyperpolarization by increasing membrane conductance. *Nature*, 252:483-485, 1974.
31. Pierau, Fr.-K., Torrey, P. and Carpenter, D.O. Afferent nerve fiber activity responding to temperature changes of the scrotal skin of the rat. *J. Neurobiol.*, 38:601-612, 1975.
32. Carpenter, D.O. and Gaubatz, G.L. H₁ and H₂ histamine receptors on *Aplysia* neurons. *Nature*, 254:343-344, 1975.
33. Carpenter, D.O., Hovey, M.M. and Bak, A.F. Resistivity of axoplasm. II. Internal resistivity of giant axons of squid and *Myxicola*. *J. Gen. Physiol.*, 66:139-148, 1975.
34. Zeman, G.H. and Carpenter, D.O. Asymmetric distribution of aspartate in ganglia and single neurons of *Aplysia*. *Comp. Biochem. Physiol.*, 52C:23-26, 1975.
35. Pierau, Fr.-K., Torrey, P. and Carpenter, D.O. Effect of ouabain and potassium-free solution on mammalian thermosensitive afferents *in vitro*. *Pflugers Arch.*, 359:349-356, 1975.
36. Swann, J.W. and Carpenter, D.O. The organization of receptors for neurotransmitters on *Aplysia* neurons. *Nature*, 258:751-754, 1975.
37. Yarowsky, P.J. and Carpenter, D.O. Aspartate: distinct receptors on *Aplysia* neurons. *Science*, 192:806-809, 1976.
38. Foster, K.R., Bidinger, J.M. and Carpenter, D.O. The electrical resistivity of aqueous cytoplasm. *Biophys. J.*, 16:991-1001, 1976.
39. Carpenter, D.O., Greene, L.A., Shain, W. and Vogel, Z. Effects of eserine and neostigmine on the interaction of α -bungarotoxin with *Aplysia* acetylcholine receptors. *Mol. Pharmacol.*, 12:999-1006, 1976.
40. Saavedra, J.M., Ribas, J., Swann, J. and Carpenter, D.O. Phenylethanolamine: A new putative neurotransmitter in *Aplysia*. *Science*, 195:1004-1006, 1977.
41. Carpenter, D.O., Swann, J.W. and Yarowsky, P.J. Effect of curare on responses to different putative neurotransmitters in *Aplysia* neurons. *J. Neurobiol.*, 8:119-132, 1977.
42. Yarowsky, P.J. and Carpenter, D.O. GABA mediated excitatory responses on *Aplysia* neurons. *Life Sci.*, 20:1441-1448, 1977.
43. Willis, J.A., Myers, P.R. and Carpenter, D.O. An ionophoretic module which controls electroosmosis. *J. Electrophysiol. Tech.*, 6:34-41, 1977.
44. Yarowsky, P.J. and Carpenter, D.O. Receptors for gamma-aminobutyric acid (GABA) on *Aplysia* neurons. *Brain Res.*, 144:75-94, 1978.
45. Carpenter, D.O., Gaubatz, G., Willis, J.A. and Severance, R. Effects of irradiation of *Aplysia* pacemaker neurons with 20 MeV electrons. *Rad. Res.*, 76:32-47, 1978.
46. Yarowsky, P.J. and Carpenter, D.O. A comparison of similar ionic responses to gamma-aminobutyric acid and acetylcholine. *J. Neurophysiol.*, 41:531-541, 1978.
47. Blum, B., Auker, C.R. and Carpenter, D.O. A head holder and stereotaxic device for the rattlesnake. *Brain Res. Bull.*, 3:271-274, 1978.

48. Swann, J.W., Sinback, C.N. and Carpenter, D.O. Dopamine-induced muscle contractions and modulation of neuromuscular transmission in *Aplysia*. *Brain Res.*, 157:167-172, 1978.
49. Swann, J.W., Sinback, C.N. and Carpenter, D.O. Evidence for identified dopamine motor neurons to the gill of *Aplysia*. *Neurosci. Lett.*, 10:275-280, 1978.
50. Kebabian, P.R., Kebabian, J.W. and Carpenter, D.O. Regulation of cyclic AMP in heart and gill of *Aplysia* by the putative neurotransmitters, dopamine and serotonin. *Life Sci.*, 24:1757-1764, 1979.
51. Carpenter, D.O. Interchangeable association of neurotransmitter receptors with several ionophores. *Brain Res. Bull.*, 4:149-152, 1979.
52. Pellmar, T.C. and Carpenter, D.O. Voltage-dependent calcium current induced by serotonin. *Nature*, 277:483-484, 1979.
53. Ruben, P.C., Swann, J.W. and Carpenter, D.O. Neurotransmitter receptors on gill muscle fibers and the gill peripheral nerve plexus in *Aplysia*. *Canad. J. Physiol. Pharmacol.*, 57:1088-1097, 1979.
54. Pellmar, T.C. and Carpenter, D.O. Serotonin induces a voltage-sensitive calcium current in neurons of *Aplysia californica*. *J. Neurophysiol.*, 44:423-439, 1980.
55. Parver, L.M., Auker, C. and Carpenter, D.O. Choroidal blood flow as a heat dissipating mechanism in the macula. *Am. J. Ophthalmol.*, 89:641-646, 1980.
56. Mell, L.D., Jr. and Carpenter, D.O. Fluorometric determination of octopamine in tissue homogenates by high-performance liquid chromatography. *Neurochem. Res.*, 5:1089-1096, 1980.
57. Braitman, D.J., Auker, C.R. and Carpenter, D.O. Thyrotropin-releasing hormone has multiple actions in cortex. *Brain Res.*, 194:244-248, 1980.
58. Meszler, R.M., Auker, C.R. and Carpenter, D.O. Fine structure and organization of the infrared receptor relay, the lateral descending nucleus of the trigeminal nerve in pit vipers. *J. Comp. Neurol.*, 196:571-584, 1981.
59. Auker, C.R., Parver, L.M., Doyle, T. and Carpenter, D.O. Choroidal blood flow: I. Ocular tissue temperature as a measure of flow. *Arch. Ophthalmol.*, 100:1323-1326, 1982.
60. Parver, L.M., Auker, C., Carpenter, D.O. and Doyle, T. Choroidal blood flow: II. Reflexive control in the monkey. *Arch. Ophthalmol.*, 100:1327-1330, 1982.
61. Hori, N., Auker, C.R., Braitman, D.J. and Carpenter, D.O. Lateral olfactory tract transmitter: Glutamate, aspartate or neither? *Cell. Mol. Neurobiol.*, 1:115-120, 1981.
62. Scappaticci, K.A., Dretchen, K.L., Carpenter, D.O. and Pellmar, T.C. Effects of furosemide on neural mechanisms in *Aplysia*. *J. Neurobiol.*, 12:329-341, 1981.
63. Pellmar, T.C. and Carpenter, D.O. Cyclic AMP induces a voltage-dependent current in neurons of *Aplysia californica*. *Neurosci. Lett.*, 22:151-157, 1981.
64. Parver, L., Auker, C. and Carpenter, D.O. Stabilization of macular temperature: The stabilizing effect of the choroidal circulation on the temperature environment of the macula. *Retina*, 2:117-120, 1982.
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