

Rec'd October 17, 2011

Dear President Lantry,

The Council will be holding its public hearing on "Amending Ch 88 of the Legislative Code pertaining to water meters . . ." this Wednesday, October 19, at 5:30 pm. A group of St. Paul Citizens has been working diligently to inform City Council members and water officials about the potential health dangers of the new "smart" water meters.

To help you prepare for the public discussion on October 19th, we have summarized our concerns in two documents. One speaks to the unfairness of asking alternative meter customers to pay \$12 for each meter reading & to maintain the meter cable. The other delineates the inaccuracies we have found in the SPRWS communications regarding the safety of these "smart" meters.

In a previous email, I have alerted Council Members to the threatening tone & intimidating actions (cutting off water service) by the Northern Works Water Supply (the local distributor for Neptune products) so I won't repeat that here.

Our urgent request to you is to read these summaries before the October 19th hearing so you will understand what's at stake in the "smart" water meter installation project. Thanking you in advance for your work on behalf of the welfare of our St. Paul citizens.

Sincerely,

Jan Greenfield
Highland Park, MN

Need for Fair Treatment of Water Customers Who Choose a Touchpad Meter

To offer a viable, affordable alternative to customers who wish to avoid exposure to Smart Meter emissions, we ask that the City Council further amend the Ordinances approved by the Board of Water Commissioners to eliminate the \$12 quarterly meter reading fee and additional "responsibilities" for those who wish to have a touchpad meter installed.

Given the findings of the recent WHO cancer research study and other independent research, it is extremely important that Saint Paul residents who are concerned about the potential health impacts of "Smart Meters" be able to choose a touchpad meter instead. We are grateful that alternative metering systems are now available, but the current fee of \$12 per quarter is prohibitive for many, and may cause some people to allow a "Smart Meter" to be installed, despite their fears it may impact their health. It does not seem fair to impose a quarterly meter reading fee on touchpad customers, many of whom are likely to be fragile and sensitive to "Smart Meter" emissions. If instead the small additional expense for touchpad meter readings were spread amongst the Water District's 94,000 customers, the additional cost per household would be only 1.147 cents per quarter. Isn't that a fairer way to offer the choice of an alternative touchpad meter to those with concerns about the impacts of "Smart Meters"?

Actual Costs of Alternative Touchpad Meters

Budgeted Meter Reading Fees 8 Times Too High:

The budget assumes that a meter reader would drive a separate 200-mile route each month to read the touchpad meters. With 250 touchpad customers, this would require 200 extra miles of driving monthly to read 85 touchpad meters. If instead, the touchpad meters are read on the regular route, the extra time required would be just 2 hours per month*, instead of 2 days per month as claimed in the budget. This means the monthly labor cost @ \$40/hour would be \$80 for 2 hours instead of \$640 for 2 days. And there would be no additional mileage driven, so no mileage fees should be assessed. This reduces the labor costs to 1/8 of what is estimated in the proposed budget.

Budgeted Equipment Costs Questionable:

The budgeted equipment costs also seem too high. Why would the touchpad readers need to be replaced every five years if they will be used so little and could presumably be repaired if they broke?** Even with the need to purchase additional Pocket Readers to equip each truck or van, these additional costs should be offset by the base cost of the touchpad meters, which we understand are less expensive than the "Smart Meters".

\$12 Quarterly Fee for Touchpad Meters 3 Times Too High to Cover Costs:

In short, the proposed \$12 quarterly fee is clearly far in excess of the actual costs that will be incurred for reading and maintaining the touchpad meters. As calculated above, the total quarterly cost per customer is just \$4.31 (\$3.18 for equipment and \$1.13 for labor), a bit more than 1/3 of the proposed fee of \$12.00.

Recommendation

Rather than having a quarterly meter reading fee for touchpad customers, the small amount of additional expense for the touchpad meters should be spread amongst the Water District's 94,000 water customers, amounting to only 1.147 cents per customer per quarter.

**According to Jerry Ludden from the water department, meter readers currently cover 350 houses in a day, doing manual readings. This is the equivalent of 50+ houses per hour, and means that the meter readers would only need to spend a total of 2 hours per month to read 100 meters, rather than the 2 days a month that is claimed in the budget to read 85 meters.*

***Mr. Ludden stated that with the current water meters, they seldom need to buy new meter reading equipment; instead they repair it when it breaks. Shouldn't they be able to do the same with the new touchpad meter reading equipment?*

THE SPRWS INFORMATION SHEET AND WEBSITE ON THE WATER METER REPLACEMENT PROGRAM CONTAIN SUBSTANTIAL INACCURACIES AND MISLEADING INFORMATION

The following is a list of some of the inaccuracies and some of the misleading information on the Information Sheet mailed out by SPRWS and also on the website.

INFORMATION SHEET

The statement contained in the information sheet that the preponderance of the scientific evidence does not link radio-frequency radiation to adverse health effects is misleading. Approximately $\frac{3}{4}$ of independently funded studies show biological effects. Approximately $\frac{3}{4}$ of industry funded studies show no biological effect. A study that shows an effect should not be weighed the same as one that shows no effect. They do not cancel each other out. There are thousands of studies that show evidence of harm.

It is misleading to state that the meter transmits a 140-milliwatt signal four times per minute. That does not reveal the radiation spike. This is like discussing the emissions of a microwave oven by talking about how much electrical power it uses, or a laser penlight's hazard to the eyes by its AAA battery.

The FCC regulations stated in the information sheet, Part 15, Title 47, only have to do with interference with a radio or television, not with health effects. The FCC does not regulate non-thermal effects of radiofrequency radiation, which is what is emitted by the Neptune meters.

Section regarding "Health Concerns."

It is misleading to compare these meters, which emit radiation every 14 seconds, 24 hours per day, to things like a T.V. remote, which emits radiation once when you click the button, or to a clothes dryer, where the dryers that people have at this point in their houses are not radiofrequency. It appears that the SPRWS wants people to think that because their clothes dryer right now does not make them sick, that these meters are the same. THEY ARE NOT.

POSSIBLE CARCINOGEN? The SPRWS does cite the World Health Organization (WHO) but incorrectly, and in a misleading fashion. The SPRWS lists caffeine and talc-based powders as listed by the WHO along with radio-frequency radiation as category 2B. Caffeine is not 2B, but 3, which is "unclassifiable." There is no link to cancer in humans. Talc is on the 2B list because it can be contaminated by asbestos and there is also some evidence that talc itself has a physical structure like that of asbestos and can behave the same way. The SPRWS does not list any of the many other items on the 2B list like DDT, lead, and asbestos. The list that the SPRWS put forth would make those reading it think that there is no cancer risk.

The SPRWS also states that studies were done with people holding cell phones to their ears, and not with these meters, which they say are in the basement, far from people. No health studies have been done at all with these water meters or with any smart meters. No one has shown that these are safe. Some analysis that has been done shows that the meters are in fact stronger than cell phones. Many people in Saint Paul have finished basements and children will play around the meters. Our own measurements of these meters show significant radiation in the rooms in the floor above the meter.

The SPRWS's list of agencies that do not find a link between cell phone use and health effects does not show any agencies, lists of medical doctors, websites, or studies that do find a link. It is also not uncommon for a lag time between the information from a large agency (in this case the 2B listing from the WHO) and the official change by other agencies. Since the WHO report came out this year at the end of May, there has not yet been sufficient time for many other agencies to respond. Note, for example, that Health Canada has just, on October 4, 2011, come out with a warning on cell phones.

WEBSITE

1. Section on "Meter Replacement Project."
 - A. The section describes the meters as "Radio-Read." This is misleading because the language makes it appear that the reading device is like a radio, and not that the meter itself pulses radio-frequency.
 - B. The public is told that there is "no upfront cost." This is misleading as the customers already have increased rates to help pay for the meters.
 - C. SPRWS states that these meters are "more reliable." This is misleading because there have been problems with leaks in Saint Paul already, and also there have been many inaccurate bills in other states. Further, Neptune's water meters like these malfunctioned in Hawaii after 9 years and Neptune did not replace them. That was considered their "life."
2. Section on "Understanding Radio Frequency."
 - A. The FCC does not regulate non-ionizing radiation, which this meter emits. It is misleading to state that the FCC's regulations "include a prudent margin of safety" when their regulations only pertain to tissue heating, and not other effects.
 - B. The list of sources does not contain any of the numerous websites, groups or even articles that reveal the health issues of radio-frequency radiation.

Due to the inaccuracies and to the misleading information presented by the SPRWS in its informational sheet and in its website, **we ask that:**

The SPRWS be asked to modify their informational sheet and website to contain a short paragraph on the WHO information, and also to state that there is a controversy on the health effects, but that the SPRWS believes that the meters are safe. Each consumer should be allowed to do their own research. In the event that the SPRWS places links on their website or information regarding other organizations, they should also place on the website links to information about studies finding health effects from radio-frequency radiation.