



March 16, 2021

Attention: Office of Environmental Health Hazard Assessment  
1001 I Street  
P.O. Box 4010, MS-12B  
Sacramento, CA 95812-4010

Via online submission at: <https://oehha.ca.gov/proposition-65/comments/comment-submissions-notice-proposed-rulemaking-amendments-article-6-clear>

Re: Notice of Proposed Rulemaking: Amendments to Article 6, Clear and Reasonable Short-Form Warnings

To Whom it may Concern:

Diamond Sports would like to thank the California EPA Office of Environmental Health Hazard Assessment for the opportunity to provide comment on the Prop 65 "Notice of Proposed Rulemaking: Amendments to Article 6, Clear and Reasonable Warnings Short-form Warnings." Diamond Sports appreciates OEHHA's willingness to engage with stakeholders on this matter.

We find the proposed amendments to be problematic, for the following reasons:

- The timing is very concerning in terms of the pandemic that has undoubtedly had a pervasive impact on businesses. Many businesses in California and nationwide are still doing everything possible to simply sustain operations, working with fewer employees and dealing with decreased profits. The implementation of the changes necessitated by the proposed amendments would be both very costly and very time consuming.
- We are of the opinion that the current short form warning serves the same purpose as the proposed new short form warning. Listing a carcinogen and/or a reproductive toxicant is not going to bolster the current short form warning to the average consumer in any meaningful way. The current short form warning provides the same level of notice, and the link to the Prop 65 website provides the consumer with the opportunity to pursue more information on the warning should they choose to do so.
- The long form warning requirement for all catalog purchases is not feasible. Under the proposed amended language, having to display the long form warning numerous times, in numerous different fashions on a given page for each applicable product would simply be a space issue. Complying with the proposed language would increase the size of catalogs, the cost to print catalogs, and would lead to an inordinate amount of waste.

For these reasons, Diamond Sports does not support the Proposed Amendments to Regulatory Text Related to Short-Form Warnings. We thank you in advance for the review and consideration of our comments. If there are any questions regarding our submission, please do not hesitate to contact us.

Sincerely,



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