

Sonnet Technologies, Inc.  
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Irvine, CA 92618

March 29, 2021

Monet Vela  
monet.vela@oehha.ca.gov

Office of Environmental Health Hazard Assessment  
1001 I Street, 23rd Floor  
P. O. Box 4010  
Sacramento, California 95812-4010  
Dear Ms Vela,

I am writing to comment on the proposed "Amendments to Article 6, Clear and Reasonable Warnings Short-form Warnings".

Sonnet Technologies has been manufacturing electronic product in California since 1986. We employ 26 people, and sell our products world-wide. As proposed, these amendments would pose an existential threat to small manufacturing companies like ours.

We produce a catalog of 90 products, with an estimated average annual sales revenue per product in California of \$3600. We do not sell more than 500 units of any single product to California customers. We have been quoted upwards of \$10,000 to test a single component of a single product for Prop 65 chemical determination. A Sonnet product may contain a power cord, plastic power supply case, painted surface, printed circuit board, dozens of electronic components, a plastic fan shroud, a data cable, etc. To test every component of every one of our products for specific chemicals would cost more than our annual profit--in a good year.

You exempt companies of fewer than 5 employees because of the compliance burden that would be placed on them. We suggest that you exempt products sold in fewer quantity than 500 annually in the State of California from the amendments to the short-form warnings. To not exempt low volume products would place an extremely-costly burden on US manufacturing small businesses.

We understand that OEHHA sent 17 letters during 2019-2020 to businesses providing short-form warnings requesting chemical exposure information for the Proposition 65 Warnings Website. Since Sonnet Technologies began complying with the regulations in 2016, Sonnet Technologies has received 0 requests from customers for additional information about our short-form warnings.

Behind every small US manufacturer over-burdened with the new requirements, stands a Chinese company, beyond the reach of California law, ready to sell their gear on Amazon to California consumers. Who would it benefit to destroy specialty American manufacturing companies? For the sake of our survival, for the 26 jobs we provide, and on behalf of all the other small American manufacturers, we urge you to exempt products sold in California at an annual quantity lower than 500 units from the proposed the proposed "Amendments to Article 6, Clear and Reasonable Warnings Short-form Warnings".

Sincerely,



Robert Farnsworth, CEO