



Peter Kent
VP & General Counsel
Invensys, Inc.
33 Commercial Street
Foxboro, MA 02035
USA

T 203 438 0009

BY EMAIL

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Mr. Donn Diebert
Department of Toxic Substances Control
1001 I Street
Sacramento, CA 95812-0806

Re: Letter from DTSC dated January 30, 2015 captioned "SETTLEMENT OF THE SUMMARY OF VIOLATIONS"

Dear Mr. Diebert,

Invensys is pleased to hear DTSC is seeking to reach an amicable resolution of the SOV and as part of that resolution sees the value in not having to negotiate changes to the collection program with each manufacturer individually.

Invensys shares these views and, based on informal and very preliminary soundings taken with other TRC members, believes it may well be possible to nominate a subset of members to negotiate those changes on behalf of some or even all of TRC's members, Invensys included.

However, it is not reasonably possible to provide a definitive response to DTSC's proposed approach within the 10 days stipulated in your letter – especially because as of this writing some TRC members have still not received the letter and therefore are operating on a different timetable to formulate their response.

Accordingly, Invensys requests an extension of the time to provide a definitive response – ideally an extension putting all TRC members on the same schedule. This will allow the Invensys response to be properly coordinated with those other TRC members who might be similarly interested in DTSC's proposal.

Very truly yours,

Peter M. Kent
VP & General Counsel
Peter.kent@invensys.com