



January 8, 2016

OEKO Institut
ROHS Exemptions
Postfach 1771
DE-79017 Freiburg
Germany
Attention: Dr. C-O. Gentsch

Re: RoHS Exemption 39b

Dear Dr. Gentsch:

Attached are two submissions for the public consultation regarding RoHS exemption 39b for lighting in displays.

- First, QD Vision is compelled to respond to the submission made by Nanoco because it seeks to paint a picture it would like others to believe to be true, but simply is not. The response speaks for itself in addressing the inconsistencies, inaccuracies, and incorrect information included in Nanoco's submission, and in recasting certain claims in the proper context.
- Second, QD Vision attaches a PowerPoint summary together with reports of test results referenced in the summary from a widely acknowledged independent third-party testing laboratory, Gamma Scientific of San Diego, California (ISO 17025 certified). Gamma Scientific has performed the standard energy efficiency testing (Regulation EC 1062/2010) originally performed by QD Vision and included in its original submission. This independent testing unequivocally confirms that QD Vision CdSe quantum dots produce an unparalleled energy saving compared to Samsung InP dots while simultaneously delivering far better colour performance.

The attached PowerPoint summary and independent testing reports from Gamma Scientific establish the superiority of QD Vision's CdSe-based technology and confirm that full system testing, as relied upon by Nanoco, is misleading. The QD Vision and Gamma Scientific approach was designed to eliminate as many external factors (ambient light settings, for example) as possible and to acknowledge that displays and televisions have unique power-consuming features that, by design, cannot be switched off. It is also designed to accommodate the fact that televisions and monitors are not necessarily designed with energy efficiency in mind and that other factors make system-level power consumption alone an insufficient metric. The results of QD Vision's and 3M's retrofitting of films and technologies demonstrate that, at the component level, the difference in colour gamut performance and energy savings between CdSe and InP QDs is even more dramatic.

It is important to recognize that Nanoco does not have a commercially available quantum dot product, nor has it clearly identified the composition of any possible future products. Accordingly, there is no demonstrable reason to presume that a hypothetical future Nanoco QD-based product would outperform those based on InP QDs manufactured by the world's largest electronics producer. We can confidently assert that Samsung's InP QDs do not meet the technical equivalence required by the RoHS directive, and that Nanoco has provided no evidence to support the technical equivalence of its unknown and currently unavailable product.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mustafa Ozgen'.

Mustafa Ozgen
Chief Executive Officer
QD Vision, Inc.
29 Hartwell Ave.
Lexington, MA 02421

Attachments

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