



**LIGHTING
TECHNOLOGIES**
INTERNATIONAL™

13700 Live Oak Avenue, Baldwin Park, CA 91706

January 20, 2017

Material License: 04-35176-01E

Docket: 040-38378

Office of Nuclear Materials Safety and Safeguards
U.S Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: PHILIPS LIGHTING TECHNOLOGIES INTERNATIONAL, REQUEST FOR
ADDITIONAL INFORMATION CONCERNING APPLICATION FOR AN
AMMENDMENT REGARDING NAME CHANGE TO LIGHTING
TECHNOLOGIES INTERNATIONAL

Dear Ms. Xu,

This letter refers to the amendment request dated December 16, 2016 (Agency wide Documents Access and Management System [Adams] Accession No. ML16356A077 for Exempt Distribution License 04-35176-01E

Please find the replies to your questions listed below:

1. Please provide a copy of your radioactive material possession and use license issued by the State of California reflecting the name change of your company.

The relevant State regulatory agency, the California Department of Public Health, does not require the licensee to hold a radioactive material possession and use license for the source material covered under US NRC Exempt Distribution license 04-35176-01E. Please reference California Code of Regulations Title 17, Division 1, Chapter 5, Subchapter 4, Group 2, Article 3, 30181 (17 CCR § 30181) – primarily 30181(c)(1)(B) and, secondarily, 30181(c)(4).

2. Please confirm that no changes were made to the product since its last amendment.

No changes have been made to the product designs since the last amendment to the license – or the original license application in 2014.



3. Provide the new label for the device indicating the new company name and the effective date of the label change.

LTI continues to manufacture and distribute from the same (pre-divestiture) facility. Within the terms of its divestiture from Philips in 2016, Lighting Technologies International, LLC (LTI) has a three year licensing agreement with Philips to retain the Philips brand on its products, packaging, and marketing literature. Since its divestiture from Philips, LTI has made minor changes to its packaging to reflect LTI as the manufacturer/initial transferor of products containing licensed material. Please see below figures 1, 2 & 3.

Print added to the inner lamp box:

“The Philips trademarks are registered trademarks of Koninklijke Philips N.V and are used under license”

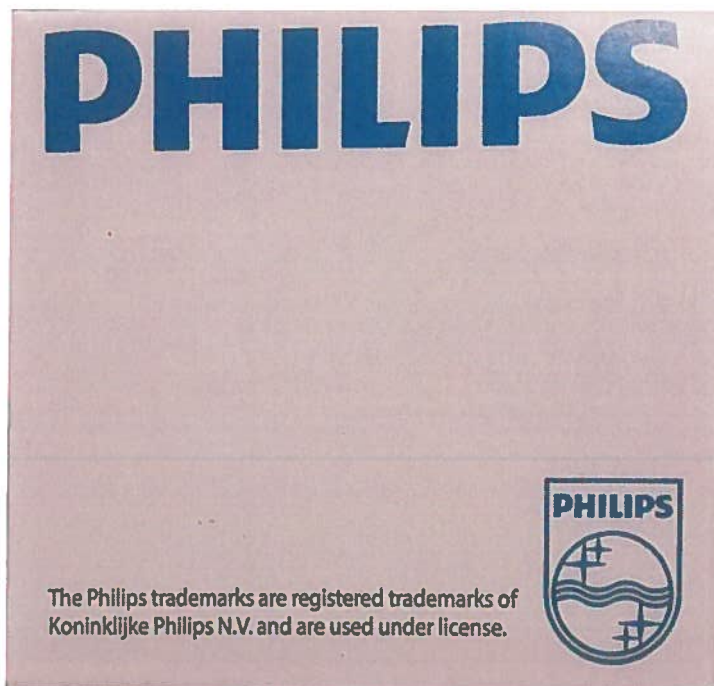


Figure 1



Print added to the bottom of the outer box: Stating the same as figure 1.

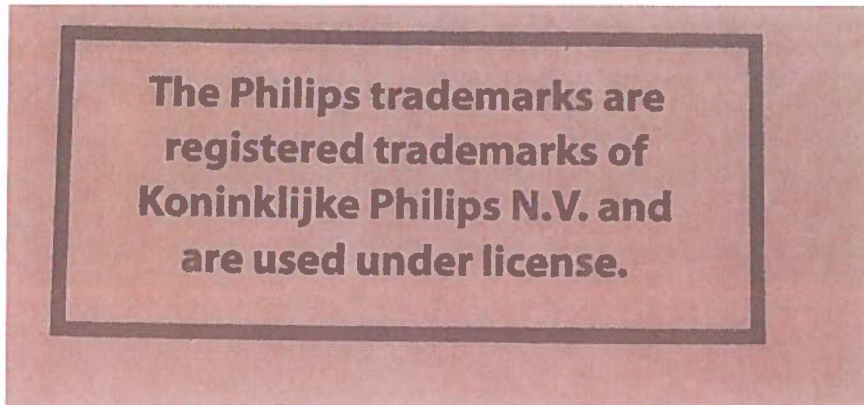


Figure 2

Print added to the outer shipping box showing the company name and shipping address



Figure 3

LTI believes it will take approximately up to 12 months to modify all of its packaging/labelling. During this time LTI will introduce its new packaging for some customers and continue using the Phillips brand for others within the licensing



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agreement with Philips. LTI respectfully requests that the USNRC recognize this transitional timeframe in its response

4. Confirm that the quality Assurance Program will remain the same for Lighting Technologies International.

As a result of the divestiture, there have been no changes in LTI's operating procedures, or specifically, its Quality Assurance Program.

If there are any questions regarding this report, or its submission, please contact me directly by phone (626) 261-4240 or by e-mail (Wesley.Buckhanon@philips.com)

Best Regards,

Wesley Buckhanon
Environmental Health and Safety Manager and Facility RSO