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May 26, 1976

Mr. Frank G. Zarb
Administrator
Federal Energy Administration
Washington, D.C. 20461

Dear Mr. Zarb:

Your Agency's concern with the PCB phase-out in electrical equipment is appreciated. Frankly, if this happens, there is a distinct possibility there will be an inadequate supply of small AC capacitors to power factor correct lighting or AC motors. The problem becomes even more horrendous when one considers the additional capacitors that will be required to achieve the mandated energy consumption reduction in appliances as required by the Federal Energy Policy and Conservation Act.

I am not implying that our industry's capacity will be inadequate. Still there is a possibility that some manufacturers may be unwilling to supply flammable non PCB impregnated capacitors because of the product liability that could result therefrom. More importantly some users may be unwilling to employ capacitors that present a fire hazard. As a matter of fact, at present, Underwriters Laboratories will not permit the use of a non PCB impregnated capacitor because of the fire hazard.

Perhaps you will be interested in the attached which is a copy of the statement made by me for our industry, to Russell Train on May 13. I do hope that a meeting can be established with yourself or Mr. Lahna so that we might communicate the situation more completely. Also, perhaps you could arrange to include representatives of ERDA at such a meeting. Obviously that organization also has a vital stake in this situation.

Regards,

Clifford H. Tuttle
President

cc: Mr. Lahna

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