March 27th, 2008

Öko-Institut e.V. - Institute for Applied Ecology
Merzhauser Str. 173
79100 Freiburg
Germany

Regarding Industry Input on RoHS directive with regards to expanding the scope of covered substances

Dear Sir, Madam

This is regarding your request for Industry input on the list of identified hazardous substances in Electrical and Electronic Equipment (EEE). On behalf of TriQuint Semiconductor, I would like to bring forth the concerns in including Arsenic/arsenic compounds on the High priority Hazardous substance list in EEE.

GaAs is used in about every cell phone and WLAN solution in the world and there is no substitute. Arsenic is used as a base material in GaAs ICs and other devices. GaAs devices have cost and performance benefits over silicon and they're found in wireless products and all high-speed communications equipment. Any proposed ban on GaAs would eventually stop most cell phones, wireless LANs, GPS which use GaAs based chipsets.

The European Semiconductor Industry Association (ESIA) has also stated that with daily use of GaAs containing products such as mobile phones, there is no risk of arsenic exposure. In the disposal phase of products, the risk of GaAs devices ending up in a landfill is adequately addressed by the WEEE directive, which mandates recycling of electronics products.

I have also attached a technical white paper from ESIA that states that Arsenic and Gallium Arsenide are fundamental to Semiconductor (Microchip) Manufacturing.

We at TriQuint Semiconductor strongly urge the exclusion of Arsenic and Arsenic based compounds from the High priority Hazardous substance list or consider granting exceptions to the Semiconductor/EEE Industry thereby permitting the use of GaAs substrates in IC’s

Sincerely
Sita Balasubramanian
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TriQuint Semiconductor
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