



January 29, 2022

**BY EMAIL**

Francis Suarez, President  
United States Conference of Mayors  
fsuarez@miamigov.com

**Re: The LED Fraud**

Dear Francis Suarez,

The US Conference of Mayors released a report in November 2021 titled Leveraging New Technologies to Modernize Infrastructure and Improve Energy Efficiency in America's Cities.<sup>1</sup> The report makes the following fraudulent statement: "*More than nine in ten cities deploy energy-efficient LED lighting in city buildings and for street lights*". **The fraudulent claim is that LEDs are energy-efficient.** LEDs do not save energy; instead, they emit a toxic, hazardous, discriminatory substance that is making Americans agitated and angry, increasing violence, causing epileptic seizures, migraines, panic attacks and eye damage.

- 1) As per the US Department of Energy, to be energy efficient, a new technology must provide the same quality of service and perform the same task as the previous technology.<sup>2</sup> The sun, an incandescent light bulb, and a High-Pressure Sodium lamp all emit uniform visible radiation to perform the task of illumination. To meet the criteria to for energy-efficient, LEDs also must emit uniform light, which they do not. Therefore, LEDs don't provide the same service as previous technologies and so it cannot be said that LEDs are energy efficient. The claim that LEDs are energy efficient or save energy as compared to incandescent, or fluorescent or HPS is fraudulent. There is no "energy savings", compared to incandescent, just a different shape of radiation which is toxic, hazardous, discriminatory, and unregulated.
- 2) The de facto standard for streetlights is IES RP-8-18 and applies to devices that emit light uniformly, such as High-Pressure Sodium. IES RP-8-18 is not applicable to LEDs and lasers because these devices emit an intense beam of light in one direction. Any LED streetlight or parking lot light cannot comply with IES RP-8-18 and there are currently no government standards or regulations for LED streetlights or parking lot lots.

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<sup>1</sup> <https://www.usmayors.org/wp-content/uploads/2021/11/USCMEnergySurvey-Release11-16.pdf>

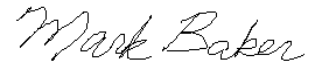
<sup>2</sup> [https://www.energystar.gov/about/about\\_energy\\_efficiency](https://www.energystar.gov/about/about_energy_efficiency)

- 3) LED streetlights are discriminatory and violate the basic tenets of the federal Americans with Disabilities Act which prohibits discrimination. People with epilepsy, autism, migraines, PTSD, and others cannot adequately see, think, or concentrate when exposed to LED visible radiation and are suffering injuries such as epileptic seizures, migraines, and panic attacks.<sup>3</sup>

Because LED devices are unregulated, because LEDs do not save energy, because LEDs do not comply with standards, and because LEDs are discriminatory, any city that installs LED devices is liable for the physical and emotional injuries caused by LED devices.

We are including our report titled, The LED Fraud which contains more details and references to source material. Additionally, we are providing reports of how LED light beams are causing injury to people. To protect themselves from liability claims and from Federal Trade Commission prosecution for making fraudulent claims, cities must clearly notify the public that LEDs are toxic, hazardous, and discriminatory, and do not save energy.

Sincerely,



Mark Baker  
President

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<sup>3</sup> <http://www.softlights.org/why-are-leds-discriminatory/>