

March 13, 2022

**BY EMAIL**

Kevin Ban, Chief Medical Officer  
Walgreens  
kevin.ban@walgreens.com

**Re: LED Discrimination**

Dear Kevin Ban,

The Soft Lights Foundation advocates for the protection of those who are LED light sensitive. We have learned that Walgreens is testing large digital displays to replace glass doors in the Walgreens cooler section of its stores.<sup>1</sup> We have grave concerns about the discriminatory nature of this technology. The purpose of this letter is to learn about Walgreen's efforts to ensure the protection of those with epilepsy, autism, migraines, PTSD, and dozens of other named neurological conditions.<sup>2</sup> We are requesting responses to the following questions:

- 1) We are not aware of any federal government regulations for LED screens to protect users from excessive or dangerous levels of non-uniform human-visible electromagnetic radiation. What are the federal regulations related to LED screens that Walgreen's is complying with, if any?
- 2) Is there any federal agency that has given approval to Walgreens to use large LED screens in place of glass doors (e.g. US Department of Energy, US Access Board, US Consumer Product Safety Commission, Federal Trade Commission)?
- 3) We are not aware of any guidelines from the US Access Board regarding surface light sources such as LED. What efforts has Walgreens made to ensure that LED display screens do not create barriers to access to Walgreens stores for those who are LED light sensitive, including the public and employees?
- 4) LED display devices push surface source human-visible electromagnetic radiation into the eyes and nerves of the consumer and employees. The LED screen is an active device, not passive. Therefore, if a person does not consent to being irradiated or having their vision degraded by

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<sup>1</sup> <https://www.cnn.com/2022/03/12/business/walgreens-freezer-screens/index.html>

<sup>2</sup> <http://www.softlights.org/wp-content/uploads/2021/12/Photophobia-Conditions.pdf>

the LED light, what civil rights options does the consumer have? Can the consumer turn the displays off?

- 5) In general, not just the cooler screens, but also for overhead lighting, strip lighting in coolers, and parking lot lighting, is Walgreens aware that there are two types of light: point sources (e.g. the sun, a candle, an incandescent, and High-Pressure Sodium) whose brightness is measured with luminous intensity in candela, and surface sources (e.g. LED and laser) whose brightness is measured with luminance in nits (candela per square meter) and that all LED light sources have the characteristics of non-uniform energy that can cause epileptic seizures, migraines, panic attacks, agitation, reduced vision, nausea and other medically negative outcomes?

Sincerely,

*Mark Baker*

Mark Baker  
President

Soft Lights Foundation  
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cc: US Access Board, US House Oversight Committee

