

June 15, 2021,

Secretary Vanessa Countryman
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: Public Input on Climate Change Disclosures

Dear Secretary Countryman:

On behalf of Silicon Laboratories Inc., we are pleased to submit comments in response to the Request for Public Input on Climate Change Disclosure. These comments are directed to (a) Scope 3 greenhouse gas emissions disclosure and (b) the evaluation and financial metrics for risk and opportunities by the issuers.

On point (a), we support mandatory GHG Protocol Scope 3 emissions disclosure requirements in the SEC climate change disclosure, but the SEC should not require tabular disclosure of a company's estimated Scope 1, 2, and 3 greenhouse gas (GHG) emissions by category. We believe a reasonable assurance level can be achieved with the GHG Protocol's well-accepted framework for measuring and reporting emissions, which covers direct and indirect emissions and the percentage of carbon, methane, and other gases.

On point (b), we believe the Commission should better define "climate-related risks" and limit those risks to known material risks, using traditional materiality concepts from the financial perspective. The lack of definition and known materiality would yield an entirely speculative disclosure. For example, under the TCFD framework, "transition risk" could be interpreted to include all known and unknown regulatory, technology, stakeholder, and legal risks. Most companies do not have a way to continuously assess the future types and forms of technologies or laws that could displace existing technologies or laws far off into the future (given the proposal's focus on long-term risks) and then evaluate whether those future changes generate potential risks. To fulfill an obligation to evaluate all possible future medium- and long-term risks would require an analysis based on increasing layers of speculation and guesswork built on top of one another. Absent clear guidelines, companies in the same industry may also analyze risks differently. A speculative and inconsistent disclosure hardly seems likely to produce valuable and meaningful information for investors.

Sincerely yours,

A handwritten signature in black ink that reads "Greg Hodgson". The signature is written in a cursive, slightly slanted style.

Greg Hodgson

VP Strategy & Corporate Development, Silicon Labs