



UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

Division of Enforcement  
Bureau of Consumer Protection

October 7, 1999

Robin Rosen Spector  
Attorney

Direct Dial  
(202) 326-3740

Mr. V.K. Sethi  
President  
SB&T Gems  
2221 South Voss, Suite 101  
Houston, TX 77057

Dear Mr. Sethi:

Thank you for your letter dated October 5, 1999. Your letter requests a staff opinion regarding whether a proposed advertisement for diamond products is in compliance with the Guides for the Jewelry, Precious Metals and Pewter Industries. 16 C.F.R. Part 23 (Jewelry Guides).

The advertisement contains fractional diamond weight representations. Section 23.17(d) of the Jewelry Guides requires that advertising containing fractional diamond weight representations contain both a statement that the diamond weights are approximate and the range of weights or the tolerances being used. The advertisement that you provided contains the range of weights but does not contain a statement that the diamond weights are approximate. A statement explaining that the diamond weights are approximate should be included in the advertisement.

In accordance with Section 1.3(c) of the Commission's Rules of Practice and Procedure (16 C.F.R. § 1.3(c)), this is a staff opinion only and has not been reviewed or approved by the Commission or by any individual Commissioner, and is given without prejudice to the right of the Commission later to rescind the advice and, where appropriate, to commence an enforcement action. In accordance with Section 1.4 of the Commission's Rules of Practice and Procedure (16 C.F.R. § 1.4), this response to your request will be placed on the public record, along with your request for advice. I hope this has been helpful. If you have any further questions, you may contact me at the above number.

Sincerely yours,

Robin Rosen Spector  
Attorney