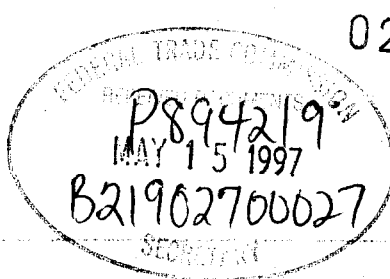


David Banks BE8456
111 Altamont Blvd.
Frackville, PA 17931



027 USA Policy Comm.
Federal Trade Commission
Washington, D.C. 20580

Dear Secretary,

I would like to let you know that I'm firmly against loosening US policy on "made in the U.S.A." items. I am a firm believer in keeping American money on American soil. Few countries are able to match the quality that is put into American products. This is why companies are pouring big money into putting pressure on your dept. to relax your standards. Lowering your standards would mean many more billions in profits for companies selling off products disguised as being "American". However, this would be defrauding the public because many of these substandard "American" products will be produced from parts of substandard quality in "sweatshops" where children are paid slave wages. Many companies are bound to reap big profits from selling America out, but the American public is bound to lose.

I realize it is hard to say "NO" to big corporations with their money and lawyers', but without the peoples' money they wouldn't even exist. Whatever your final decision is, just don't sell America short. The American public is much too proud of its products to lend its "Made in the U.S.A." label to substandard foreign parts and products.

Thank You, for reading this, and I hope it has some impact on your final decision. Don't worry about going against big corporations; because the whole American Public will be standing behind you.

Sincerely,
David Banks

P.S. enclosed is the article of which I'm responding to.

'Made in USA' diluted

OUR VIEW The FCC, deserting consumers, Plans to make 'Made in the USA' label an illusion. A cave-in to pressure.

When does "Made in the USA" not mean what it says?

When makers of athletic shoes, hand tools and other products use the label to cloak imported content. And that's about to happen on a broad scale.

The Federal Trade Commission pressured by manufacturers and retailers, wants to relax standards for using the label.

Under guidelines announced this week, 25% of a bicycle or lawn mower, for example, could be manufactured elsewhere and still carry "Made in the USA" if the final assembly occurred within U.S. borders.

If subassembly occurs in the U.S. as well, all components can be foreign.

So much for truth in advertising.

Obviously, in an increasingly interdependent world, the raw materials for many products originate elsewhere. But for 50 years the minimum standard for asserting U.S. origin was that 98% of the manufacturing costs had been incurred here.

Products with greater percentages of foreign components still can proclaim national loyalty with other labels. "Made in USA of U.S. and imported parts," for instance, or "U.S. content: 60%."

But that kind of honesty with consumers isn't good enough for some. When two major makers of athletic shoes, New Balance and Hyde Athletic, were accused in 1994 of using "Made in the USA" labels on shoes with Chinese soles, they bunched a political counterattack. They recruited members of Congress to help define down the standard. Other businesses joined in, many arguing that a mere 50% U.S. content was enough to call a product U.S.-made.

New Balance and others say that by using imported parts, they are able to keep final-assembly jobs in the United States. Unions reply that eroding the made-in-the-USA definition permits more jobs to move offshore. Either way, protecting U.S. jobs is no business of the FTC; protecting U.S. consumers from spurious claims is.

The FTC's director of consumer protection calls fudging the U.S.-made definition a reflection of the reality of a globalized economy. But the real reflection of a globalized economy would be honest labeling that shows the diverse roots of today's consumer products, not a politically driven rewrite of the dictionary.

Public comment on the FTC proposal will be accepted until Aug. 11, after which it can be implemented. To comment, write: Mu&in the USA Policy Comment, Office of the Secretary, Federal Trade Commission, Room 159, Sixth and Pennsylvania Ave. N. W., Washington, D.C. 20580.

Give workers a break

OPPOSING VIEW Consumers understand what the 'USA' labels mean. And they support keeping U.S. jobs.

By Jim Davis

To its credit, the Federal Trade Commission has proposed "Made in the USA" guidelines that recognize that dramatic global changes in manufacturing and trade have recurred in the last 50 years.

Competition from imports that cost far less to produce and unavailability here of some components or materials have created a climate in which maintaining a U.S. manufacturing base becomes more difficult each day. Given these changes, a 100% domestic content requirement is impossible for almost any manufacturer to meet.

We need a more realistic standard that will encourage rather than disadvantage U.S. manufacturing and still be consistent with consumers' understanding that a product with a "Made in the USA" label was made at a U.S. facility by U.S. manufacturing workers.

As New Balance has argued before the FTC, an unqualified "Made in the USA" label on a product that has a majority of U.S. value and for which final manufactur-

ing has taken place inside the United States is consistent with consumers' understanding that buying U.S.-made goods supports our economy and helps provide jobs. A realistic standard that U.S. companies can meet will encourage U.S. manufacturers to maintain and, as in New Balance's case, expand their domestic operations and allow them to compete more fairly with imports.

Today's consumers understand that domestic manufacturers have an increasingly difficult time competing with imported products made in countries where the cost of labor, taxes and compliance with government regulation is far lower. Consumers know that most products they purchase, including American automobiles, have parts or materials from more than one country.

At the same time, U.S. consumers are increasingly concerned about the exodus of jobs that occurs when manufacturers move their operations offshore to take advantage of lower labor costs. An updated standard, one that supports U.S. companies that are struggling to maintain a domestic manufacturing base and to provide jobs for U.S. workers, will also serve the interest of consumers who want to support U.S. industry and jobs in their purchases.

Jim Davis is chairman and chief executive of New Balance Athletic Shoe Inc.