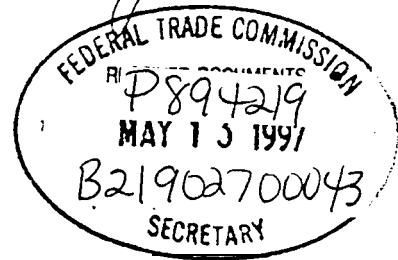


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10 May 1997

Federal Trade Commission,  
 Washington, D.C.



The enclosed Editorial is from  
 8 May 97 News paper U.S.A. TODAY.

I agree with USAToday's position for  
 honest labeling. "Made in USA" is  
 important to consumers,

Clear, direct and simple guide-  
 lines promulgated with integrity  
 is all the U.S. consumer requires.

Yours

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Debate: TRUTH IN LABELING

# '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" riot, 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 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 launched 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 re-write of the dictionary.

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