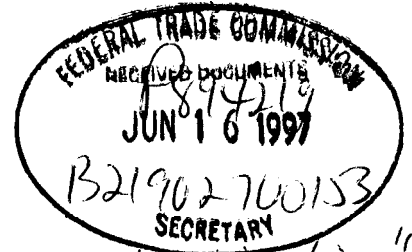


Cathedral City Ca

13 June 1997

p 1 of 2

Office of the Secretary
 Federal Trade Commission
 Room 159 6th & Pennsylvania NW
 Wash. D.C. 20580



Gentlemen:

Comments to "Proposed Guides for the use of US origin claims" are as follows:

1. p 71 ¶ I Statement of Purpose
 More rigid definition required for enforcement
2. p 72 ¶ II Review Procedure
 5 years is too long. Also public review is required to assure fairness
3. p 77 Unqualified US origin claims
 75% US content should be 100% or it is deceptive and should be made unlawful.
4. p 79 Two levels of substantial transformation
 irrespective of customs the examples of US Auto manufactures in Ontario Canada should be made to reveal % of USA and % of Canada. Today they simply state "% of US & Canada is ---."
5. p 80 sec 4 above for same comment
6. p 88 "Origin: USA" labels
 Example 2 is offensive. I regard it as deceptive if only marked on the box.
 Example 3 is not strong enough
7. p 60 sec VII stronger action is required
8. p 55 3rd paragraph
 I am offended by statement that "30% is Foreign & rest of product"

12 Jun 97 HG

p 2 of 2

made & final assy in us" is viewed by
67%. It is how you asked the
question. I recommend you review
your methods.

9. p 53 consistency with Buy American Act & other standards
Rework of 50% standard with the
appropriate law is a needed effort
on your part to correct. Government
is going having for sure again.

10. p 48, 47, 21, 18, 17

comment. 3M, New Balance and other
companies have too much influence
and consumers have too little
consideration. Please correct this
perception.

Sincerely,

Hugo G. Goodrum

Hugo G. Goodrum

68640 Los Gatos Rd

Cathedral City Ca 92234

Private Citizen of USA