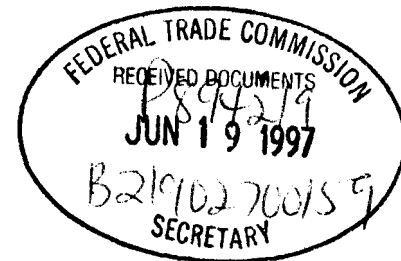


BEN FORMAN & SONS, INC.

159

201 WATER STREET
BROOKLYN, NEW YORK 11201 USA
PHONE: (718) 522-1100 FAX: (718) 596-3959
email: sales@benforman.com



Tuesday, June 17, 1997

Federal Trade Commission
Room 159
6 Pennsylvania Avenue
Washington, D.C. 20580

Subject: Made in the U.S.A. Policy Comment - F.T.C. file number P89-4219

Gentlemen:

I am the manager of a medium-sized manufacturing company in downtown Brooklyn, New York, with fewer than 150 employees.

We read with great anxiousness an article in the Wall Street Journal that discussed the FTC's proposals to reduce the amount of domestic content required in order to mark a product "Made in the USA".

Our company is a *domestic, unionized, manufacturer* that will not be able to compete against imports if they are able to mark something "Made in the USA" without it being predominantly made here.

Being able to mark a product "Made in the USA" is a significant marketing advantage we have.

These proposals would have a disastrous effect on our company. Please do not give this small asset to our predominantly foreign competition.

We would all appreciate any support you can give in this matter.

Very truly yours,


Peter A. Forman

P0617971

United States Senate
WASHINGTON, DC 20510-3202

June 3, 1997

Federal Trade Commission
Congressional Liaison
Washington, D.C. 20580

FEDERAL TRADE COMMISSION
RECEIVED
JUL 22 1997
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SECRETARY

FEDERAL TRADE COMMISSION
97 JUN 18 PM 1:02
JUL 16. CHARLES BRANCH

0020228

Dear Director:

Because of the desire of this office to be responsive to all inquiries and communications, your consideration of the attached is requested.

PLEASE TRY TO RESPOND WITHIN 4 WEEKS OF YOUR RECEIPT OF THIS REQUEST. YOUR FINDINGS AND VIEWS, IN DUPLICATE, ALONG WITH RETURN OF THIS MEMO PLUS ENCLOSURE, WILL BE APPRECIATED.

Many thanks.

Sincerely,
Alfonse M. D'Amato

Alfonse M. D'Amato
United States Senator

AMD: amr
Enclosure

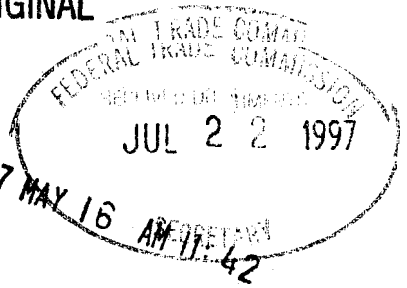
JUN 17 1997

FEDERAL TRADE COMMISSION
ALBANY, NY 12207

ORIGINAL

BEN FORMAN & SONS, INC.

201 WATER STREET
BROOKLYN, NEW YORK 11201 USA
PHONE: (718) 522-1100 FAX: (718) 5963959
email: sales@benforman.com



Tuesday, May 13, 1997

Senator Alphonse D'Amato
370 Seventh Avenue Room 600
New York, NY 10001

Dear Senator:

I have enclosed a copy of an article from the Wall Street Journal that I read the **other** day. It discusses the fact that the FTC (Federal Trade Commission) is considering reducing the amount of domestic content in order to mark a product "Made in the USA".

We are a large manufacturing company in downtown Brooklyn, New York, with under 150 employees.

We are a domestic, unionized, manufacturer. We will not be able to compete against imports if they are able to mark something "Made in the USA" without it being predominantly made here. Proposals in the enclosed article would be **devastating** to our company. We would appreciate any support you can give us on this matter. Please **feel** free to contact us for additional information as required.

very truly yours,

A handwritten signature in black ink, appearing to read "Peter A. Forman".

Peter A. Forman
Ben Forman & Sons, Inc.

PAF/r

Enclosure: Article from Wall Street Journal

cc: Senator Moynihan
cc: President Clinton

P0513971

Made in USA May Take On New Meaning

By BRUCE INGERSOLL

Staff Reporter of THE WALL STREET JOURNAL

The government is proposing to let consumer-product makers judge their Made-in-USA claims.

Under a Federal Trade Commission proposal announced yesterday, products no longer would have to be "all or virtually all made" with domestic labor and materials for manufacturers to label and advertise them as All-American wares.

The proposed guidelines, FTC officials said, are designed to reflect the increasing interdependence of manufacturers in the global marketplace and the growing understanding of U.S. consumers about how the products they buy are made.

The agency's Proposal would let companies label products "Made in USA" if at least 75% of the manufacturing costs are incurred in the U.S. and if the product is "substantially transformed," or assembled, in this country. For 50 years, 98% of the costs has been the generally accepted minimum standard for claiming U.S. origin. The FTC also said it would allow U.S.-made claims by manufacturers who assemble their products in the U.S. and use major components that also have been assembled in the U.S. But some of those components can be foreign-made, under the FTC proposal.

"We sought to strike a balance between two important concerns: the commission's recognition that our policies must keep up with changes in the global economy and ensure that consumers aren't deceived," said Jodie Bernstein, director of the FTC's Bureau of Consumer Protection.

The proposal stems largely from a 1994 enforcement action that FTC brought against New Balance Athletic Shoes Inc. The FTC charged the Boston-based manufacturer with deceptive advertising and labeling because New Balance imported outer soles from China for some of its footwear and claimed the shoes were American made.

The company responded by mobilizing [the congressional delegations of Massachusetts and Maine, where it has factories employing 1,200, and mounting a lobbying campaign for a more flexible U.S.-origins standard. Scores of companies from a broad spectrum of industries weighed in with comments, as did 26 members of Congress, who were evenly divided on the issue.

The FTC has set a deadline of Aug. 11 for public comment, after which it will issue final guidelines. The new standards would not apply to the automobile, textile, woolen or fur industries, which are regulated by individual statutes.

The proposal is bound to be highly controversial. Many consumer groups and labor organizations vehemently object to liberalizing the U.S.-origins standard, saying the proposal would unleash an onslaught of misleading marketing claims on unwary shoppers. Manufacture of wholly domestic products complain it would confer an unfair advantage on rival companies that use less-expensive foreign-made parts and materials in their manufacturing processes.

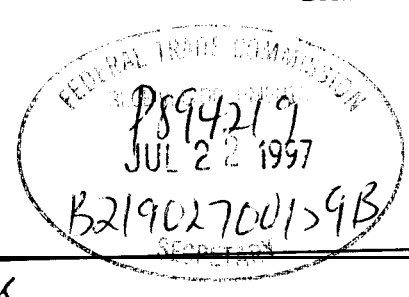
The proposed guidelines "will be confusing to a lot of consumers," asserted Edwin Rothschild, spokesman for Consumer Action, a federation of 30 state consumer groups. "The Made-in-USA label should be reserved for items that are actually manu-

Please Turn to Page B2, Column 6

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FEDERAL TRADE COMMISSION
97 JUN 26 AM 7:46
CONG. CORRES. BRANCH

THE WHITE HOUSE
WASHINGTON

6-19-97
DATE



MEMORANDUM FOR: ETC (30)

FROM : SUE J. SMITH *sgs*
DIRECTOR, OFFICE OF AGENCY LIAISON

SUBJECT : REFERRAL OF WHITE HOUSE BULK MAIL

Thank you for your continued hard work in ensuring responses to the Presidential letters and inquiries forwarded to your agency. The volume of mail that the President and Mrs. Clinton receive still remains unprecedented.

Please return any misreferrals to me at the following address:

Ms . Sue J. Smith
Director, Office of Agency Liaison
Room 6, OEOB
The White House
Washington, D.C. 20500

If you have any questions, please do not hesitate to call me at 202/456-7486.

Thank you very much.

BEN FORMAN & SONS, INC.

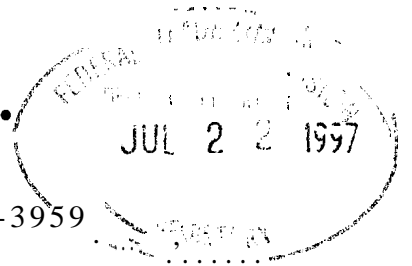
201 WATER STREET

BROOKLYN, NEW YORK 11201 USA

PHONE: (718) 522-1100 FAX: (718) 596-3959

email: sales@benforman.com

FTC
K.S.



Thursday, May 15, 1997

President Bill Clinton
1600 Pennsylvania Avenue
Washington, DC 10500

Dear Mr. President:

I have enclosed a copy of an article from the Wall Street Journal that I read the other day. It discusses the fact that the FTC (Federal Trade Commission) is considering reducing the amount of domestic content in order to mark a Product 'Made 'n he USA".

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We are domestic, unionized, manufacturer. We will not be able to compete against imports if they are able to ~~mark something~~ "Made in the USA" without it being "predominantly made here. Proposals in the enclosed article would be devastating to our company. We would appreciate any support you can give us on this matter. Please feel free to contact us for additional information as required.

Very truly yours,

Peter A. Forman

Peter A. Forman
Ben Forman & Sons, Inc.

PAF/r

Enclosure: Article from Wall Street Journal

P0513971

LABOR *May '92*

'Made in USA' May Take On New Meaning

By BRUCE INGERSOLL

Staff Reporter of THE WALL STREET JOURNAL

The government is proposing to let consumer-product makers fudge their Made-in-USA claims.

Under a Federal Trade Commission proposal announced yesterday, products no longer all made with domestic labor and materials for manufacturers to label and advertise them as All-American wares.

The proposed guidelines, FTC officials said, are designed to reflect the increasing interdependence of manufacturers in the global marketplace and the growing understanding of U.S. consumers about how the products they buy are made.

The agency's proposal would let companies label products "Made in USA" if at least 75% of the manufacturing costs are incurred in the U.S. and if the product is "substantially transformed," or assembled, in this country. For 50 years, 98% of the costs has been the generally accepted minimum standard for claiming origin. The FTC also said it would allow U.S.-made claims by manufacturers who assemble their inducts in the U.S. and use major continents that also have been assembled in the U.S. But some of those components can be foreign-made, under the FTC proposal.

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with changes in the global economy and ensure that consumers aren't deceived," said Jodie Bernstein, director of the FTC's Bureau of Consumer Protection.

The proposal stems largely from a 1994 enforcement action that FTC brought against New Balance Athletic Shoes Inc. The FTC charged the Boston-based manufacturer with deceptive advertising and labeling because New Balance imported outer soles from China for some of its footwear and "claimed" the shoes were American made.

The company responded by mobilizing the congressional delegations of Massachusetts and Maine, where it has factories, employing 1,200, and mounting a lobbying campaign for a more flexible U.S.-origins standard. Scores of companies from a broad spectrum of industries weighed in, "with comments," as did '26 members of Congress, who were evenly divided on the issue.

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The proposal is bound to be highly controversial. Many consumer groups and labor organizations vehemently object to liberalizing the U.S. standard, saying the proposal would unleash an onslaught of misleading marketing claims on unwary shoppers. Manufacturers of wholly domestic products complain it would confer an unfair advantage on rival companies that use less-expensive foreign-made parts and materials in their manufacturing processes.

The proposed "guidelines" will be confusing to a lot of consumers," asserted Edwin Rothschild, spokesman for Consumer Action, a federation of 30 state consumer groups. "The Made-in-USA label should be reserved for items that are actually manu-

Please Turn to Page B.?, Column 6