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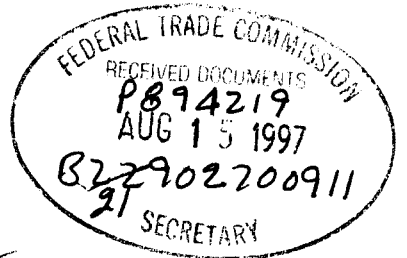
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Personal & Unofficial

August 7, 1997

*Elaine Kolish
Bureau of Consumer Protection
Federal Trade Commission
Room 159
Seventh Pennsylvania Avenue NW
Washington, DC 20580*



Dear Ms. Kolish:

I am writing you in total opposition to the proposed guidelines which will dilute, water down and undermine the significant consumer meaning of "Made in USA."

As a former New York State Assemblyman and a former senior member of the Consumer Affairs Committee, I fight strongly for truth in labeling. These proposed guidelines will render "Made in USA" less and less meaningful to buyers who wish to support American workers and their jobs. The good paying manufacturing jobs of American workers are being shipped overseas to countries which use child and prison labor. Strengthen the label with "Made Only in USA." Endanger a recent article I wrote on this subject.

Sincerely,

14th Floor, Agency 4 Building, Assembly P.O. Box 167, Albany, New York, (2248) (518) 455-5087
2 World Trade Center, Suite 5026, New York, New York 10047 (212) 488-5335

*Joseph Ferris
519 Third Street Brooklyn New York 11215*



A SURE SHOT

When 'Made in USA' isn't

JOE FERRIS

"The guides propose a new standard for making unqualified 'Made in USA' claims. To be called 'Made in USA,' a product must be substantially all made in the United States.

"A product will be considered substantially all made in the United States if: US manufacturing costs are at least 75 percent of manufacturing costs and the product was last substantially transformed in the United States and all significant parts or components of the product were substantially transformed in the United States."

Federal Trade Commission, June 23, 1997

Tucked away in the gobbledy gook of the Federal Register there is this set of proposed guidelines which will dilute, water down and undermine the significant meaning of "Made in USA."

These guidelines will further erode our manufacturing base and will eliminate untold thousands of decent manufacturing jobs in our country.

It is becoming harder and harder, if not impossible, to find clothes, shoes, electronics, toys, appliances and a whole

array of products still made by American workers.

Under the current law, for a product to bear the label "Made in USA," it must be "wholly domestic" with a "de minimus" or small amount of foreign content.

The Clinton Administration free traders and the multinational corporations have lobbied aggressively the Federal Trade Commission (FTC) to change the current law and to allow goods which are not wholly produced in America to be labeled "Made in USA."

To justify the very damaging impact of these proposed guidelines upon America's manufacturing jobs, the FTC, in its press release of May 5, stated the following regarding "Made in USA:" "The Commission has tentatively concluded that is not what consumers expect in an increasingly global economy."

The FTC is dead wrong. People do care where things are made. A label should tell a lot. Was this product made by workers earning a just wage under decent environmentally safe conditions or was it made by child or slave or prison labor?

"Made in USA" also means that our fellow citizens in small towns and cities are earning their daily bread with the wherewithal to raise their families, pay taxes and buy other goods and services from local businesses and manufacture.

The sleeper in these guidelines is the outsourcing of parts for big ticket items like automobiles and appliances. If 25 percent of the manufactured costs can be done outside our country, the product will still be able to bear the "Made in USA" label.

Since the North American Free Trade Agreement (NAFTA) and the General Agreement on Trade and Tariffs (GATT), our country has lost tens of thousands of well-paying manufacturing jobs. This year's trade deficit, primarily with China, Japan and Mexico, is running at the rate of 100 billion dollars.

Recently, with scant press attention, Swingline Staplers in Long Island City announced it was relocating 450 manufacturing jobs to Mexi-

co. Perhaps, for the Bureau of Labor, this is another cold statistic, but it is the lives and futures of 450 families.

It is estimated that by the end of this decade, New York State will lose 100,000 clothing and textile jobs thanks to GATT. The Amalgamated Clothing and Textile Workers Union recently merged into the ILGWU.

Behind these trade deals and the FTC regulatory changes are the corrupt corporate campaign contributions to this past presidential and congressional campaigns. In the quid pro quo of campaign contributions, American workers are sacrificed and their jobs are sent overseas for the benefit of multinational corporations.

What can citizens do?

The FTC is accepting written comments on these proposed guidelines which are due by Aug. 11, 1997 and should be identified as "Made in USA Policy Comment" and addressed to the Office of the Secretary, Federal Trade Commission, Room 159, Sixth and Pennsylvania Avenue, NW, Washington, DC 20580, or call Elaine Kolish, Bureau of Consumer Protection, 202-326-3042.

Also, make a local phone call to the members of the Brooklyn Congressional delegation. Here are their numbers Carolyn Maloney, 212-832-6531; Jerrold Nader, 212-334-3207; Major Owens, 718-773-3100; Charles Schumer, 718-627-9700; Ed Towns, 718-387-8696; Nydia Velazquez, 718-599-3658

Tell them: keep truth in labeling. "MADE ONLY IN USA."

Only citizens can govern.

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