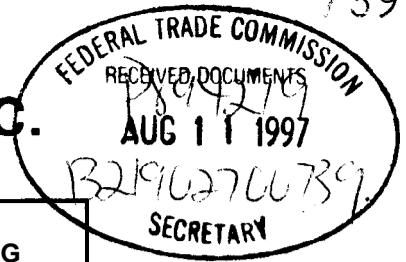




KERN SPECIAL TOOLS CO., INC.



140 Glen Street
New Britain, CT 06051

WIRE EDM SPECIALISTS

Phone (860) 223-0236
Fax (860) 223-9324

August 7, 1997

Kent Howerton
Federal Trade Commission
Division of Advertising Practices
Room S4302
6th Street & Pennsylvania Avenue NW
Washington, DC 20580

Subject: Made in USA

Dear Mr. Howerton:

It was a pleasure speaking with you today. Your efforts to provide me with additional information on the subject and your referral to Lou Alfano of the Customs Service are sincerely appreciated. I will certainly mention your co-operation to Attorney General Blumenthal in our future discussions.

I am opposed to the dilution of the requirements for the "Made in USA" designation for manufactured goods. Many American companies, as well as consumers, rely on the integrity of the "Made in USA" designation to make informed purchase decisions, and it would indeed be unfortunate to see the requirements for this important disclosure modified for the financial gain of the privileged few at the expense of society in general.

Even with the current requirements for the "Made in USA" designation, many companies either omit labeling the country of origin of their products or apply the "Made in USA" label to products with far less than the required domestic content.

I currently compete with a Connecticut company that produces and markets a product which they market as being "manufactured right here in the USA" and label as "Made in USA". (Photocopies of magazine advertising and product labels are enclosed) In fact, approximately seventy per cent (70%) of the value of the product results from raw material and manufacturing activities that occur outside of the USA. (Germany or Mexico) In addition, the final manufacturing processes performed in the USA do not significantly alter the form of the product, only its final dimensions and packaging.

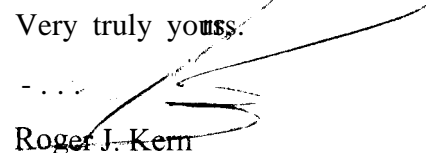
This "creative" use of the "Made in USA" designation has caused considerable confusion in my company's local and national marketplace of normally well informed industrial customers and has had a negative financial impact on my company and its employees.

Can your agency help me address this form of unfair competition? Any assistance you or the Federal Trade Commission can render would be sincerely appreciated. If further or more detailed information is required, please contact me.

As I have demonstrated, even with the current "tough" standards on the "Made in USA" designation, there are significant opportunities for abuse. Further loosening of the requirements will multiply the opportunities for consumer misinformation.

Thank you for your time and consideration.

Very truly yours:



Roger J. Kern
President

enclosures:

The Wire Works Inc

Size
.010 Inch
0.25 mm

Length
13,200 Yds
12,000 M

Tensile
130,000 PSI
900N/mm²

Control

32351

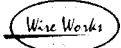
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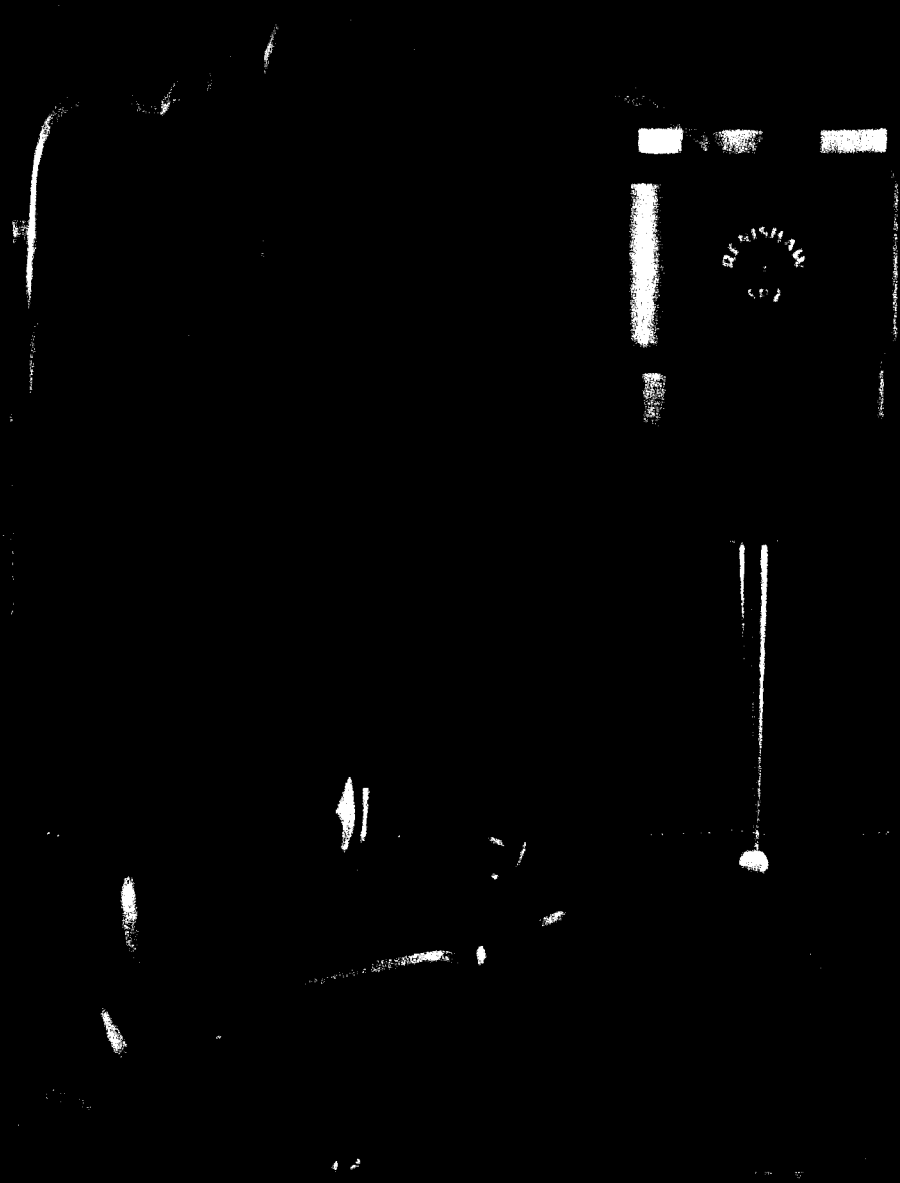
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