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August 14, 1997



Mr. Kent C. Howerton
Office of the Secretary
Federal Trade Commission
Room 159
Sixth and Pennsylvania
Avenue, N.W.
Washington, D.C. 20580

Dear Mr. Howerton:

We believe that the Federal Trade Commission should go no further in changing manufacturing criteria in products form as of 1995. The criteria should consist of being based on the 98% of materials and labor costs at that time--quality for the "Made in U.S.A." label.

Safe harbors should be as follows:

- (1) 98% of materials and labor costs.
- (2) Two levels of manufacturing in the United States.
 - (a) Last transformation made in the United States of a product--98%.
 - (b) Significant 98% of inputs took place in the United States.

Products with foreign origin should specify "Materials Made in Foreign Country and Assembled in the U.S.A." --label stating such.

Other labels should and could specify material and/or labor content of country involved.

Comments based on Federal Register dated May 7, 1997, F.T.C. News May 5, 1997, and highlights of the proposed guidelines. Also Insight Magazine August 11, 1997.

Very truly yours,
 Richard C. Dean
Richard C. Dean
 Elizabeth H. Dean
Elizabeth H. Dean