

ORIGINAL

PATTON BOGGS LLP
ATTORNEYS AT LAW

2550 M Street, NW
Washington, DC 20037-1350
202-457-6000

Facsimile 202-457-6315
www.pattonboggs.com

March 12, 2007

Paul D. Rubin
202-457-5646
prubin@pattonboggs.com

Mr. Donald S. Clark
Office of the Secretary
Federal Trade Commission
600 Pennsylvania Avenue, NW
Room 135-H
Washington, DC 20580

236687
535084

Re: Request for Extension of Comment Period in Response to Proposed Amendment to the Platinum Section of the Guides for the Jewelry, Precious Metals, and Pewter Industries ("Platinum Guides") [Jewelry Guides, Matter No. G711001]

Dear Mr. Clark:

On behalf of our client, Platinum Guild International ("PGI"), we respectfully request an extension of the comment period for the proposed amendment to the Platinum Guides for an additional 90 days to August 25, 2008.

The proposed amendment to the Platinum Guides was published in the Federal Register on February 26, 2008, and comments are currently due on May 27, 2008. The Commission requested written responses to 19 questions, including over 20 subparts, and expressly requested the submission of empirical data. Due to the complexity of this proposed rule, the number of questions posed, and the Commission's request for empirical data, we believe the current 90 day comment period does not provide sufficient time for PGI and other stakeholders to develop comments that address the issues directly raised or implicated by the proposal.

We believe the FTC would benefit by granting stakeholders sufficient time to develop their comments and generate data to address as many of the 19 questions, and over 20 subparts, as possible. Accordingly, we respectfully request that the FTC extend the comment period until August 25, 2008.

Respectfully Submitted,



Paul D. Rubin

cc: Ms. Robin R. Spector
Division of Enforcement
Federal Trade Commission