

Birks & Mayors, Inc.



August 25, 2008
Federal Trade Commission/Office of the Secretary
Room 135-H (Annex E)
600 Pennsylvania Ave. N.W.
Washington, DC 20580

RE: Jewelry Guides, Matter No. G711001

I would like to state collective comments from Birks & Mayors Inc. senior management regarding Matter No. G711001, specific to the proposed guideline changes to the Guides for the Jewelry, Precious Metals and Pewter Industries.

Birks and Mayors is not in favor of the proposed changes which would allow companies to use the term Platinum to market jewelry alloyed with base metals, even if they contained at least 50% of platinum.

Our position is as follows:

- that platinum/base metal jewelry should not be allowed to use the term "platinum"
- that the proposal is unworkable in terms of industry implementation and would be confusing to consumers
- that it is not in harmony with international standards
- that the FTC consider a new and different name for jewelry comprised of platinum and base metals.

Further, we strongly recommended that the FTC consider a new and different name for jewelry comprised of platinum and base metals.

Respectively,

John Orrico
Sr. VP Chief Supply Chain Officer
Birks & Mayors Inc.

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