

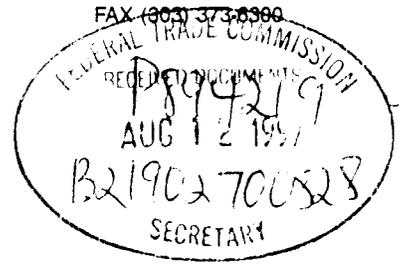
Tom Leonard

in America



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

Dear Mr. Secretary:

The US Federal Trade Commission recently proposed new guidelines to **govern** unqualified "Made in USA" origin claims. The proposed guidelines would replace the present "all or virtually all" US content standard, a standard many American luggage and leather goods manufacturers cannot meet, with a modestly improved "substantially all" standard. The substantially all standard is defined as 75% A US content (labor and materials).

Samsonite Corporation believes that the 75% content standard will be relatively **difficult** for a great many US-manufactured products to meet. However, the FTC's proposed standard is an important breakthrough because it acknowledges present day marketplace realities. Today, US producers operate in a global economy and contend with a dwindling supplier base. Also, US producers must compete against foreign suppliers whose wage rates and other production costs fall well below US standards. Most important, US manufacturers must have the ability to advertise "Made in the USA" to compete against foreign goods to keep US factories open.

Samsonite Corporation urges the Commission to continue its efforts to reach a standard for unqualified "Made in the USA" origin claims that strikes a **balance** between consumer expectations and the realities of today's marketplace.

Sincerely,

Tom Leonard

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