

July 28, 1997

Office of the Secretary  
 Federal Trade Commission (Room 159)  
 Sixth and Pennsylvania Ave., N.W.  
 Washington, DC 20580

Ref: "Made in USA Policy  
 Comment" FTC File  
 No. P894219

To Whom It May Concern:

I am opposed to the proposed new Guides for the Use of U. S. Origin Claims announced by the Federal Trade Commission on May 5, 1997.

I believe that the "Made in the USA" claim is a definitive term and therefore can only mean "all or virtually all". Any deviation from this definition, to 75% or otherwise, should be treated as a qualification such as "Made in USA and 25% foreign material".

To sanction alternative guidelines would be to invite deceptive and dangerous marketing activity.

My opinions are based on the following reasons in addition to the other objections expressed in the earlier review and workshop.

A. The proposed guides will encourage the use of unsafe and illegal materials used in the manufacture of goods utilizing the "Made in USA" claim.

The granting of a safe harbour of 75% is an open invitation to all companies now adhering to the "all or virtually all" standard to reduce their domestic raw materials use by 25% in order to chase the phantom of reduced costs from foreign outsourcing.

Example 1. paint, used to decorate the outside of manufactured goods such as toys, easily falls within 25% of manufacturing costs.

In the U.S., lead-based paint is outlawed under the U. S. Consumer Product Safety Act. Therefore, it is currently safe for a consumer to assume that any product, such as a child's toy, which utilizes the "Made in USA" claim, will be painted with lead-free paint.

This assumption is possible because whichever U.S. paint company the "Made in USA" claimant should purchase its paint from, will by U.S. law, supply only lead-free paint.

Under the proposed guides, manufacturers will be tempted to purchase cheaper lead-based paint from foreign sources who do not have to follow U.S. laws.

---

From: Frank J. Altschul, Jr., 63 Boxwood Terrace, Red Bank, NJ 07701-6707  
 Tel: 732-747-5942

B. Products painted with unlawful lead-based paint are currently being imported into the United States from such insensitive countries as China and China will soon become the largest supplier of foreign goods to the U.S. This will involve both raw materials and finished goods.

Example 1. U. S. Products Safety Commission Release #97-042 (attached as page 3) reported wooden child's toys, painted with lead-based paint, being imported into the U. S. from China. 44,000 of these dangerous toys were sold in the U.S. over a period of two years.

Example 2. U. S. Consumer Product Safety Commission Release #97-083 (attached as pages 4&5) reported infant's clothing, made by an American manufacturer, to contain cap snaps painted with lead-based paint which was obtained from foreign sources. Although the release does not specifically state these sources, a check by This Writer in Kmart Stores disclosed that all "Wear Me Apparel Corp" infant's clothing with the Brand "Little Miracles" had an "Imported" label sewn-in the garment. "Imported" denotes that both labor and material are foreign.

30,000 pieces of this dangerous clothing was sold to U. S. consumers.

Example 3. U. S. Consumer Product Safety Commission Release #96-092 (attached as pages 6&7) reported 42,000 toys imported from our insensitive NAFTA "trading" partner, Mexico, which were painted with lead-based paint. The release describes these toys as violating U.S. laws and being dangerous to children if consumed.

C. Unsafe products are difficult to detect.

The U.S. Consumer Product Safety Commission, while it does a very good job protecting the U.S. public from unsafe products, is none-the-less not a large agency within the U.S. government. The U.S. Consumer Product Safety Commission simply does not have a staff large enough to inspect every product before it hits the market.

Rather, the CPSC relies mainly on random spot-checking and tips from consumers and other agencies.

Therefore, it is easy to understand why hundreds of thousands of unsafe products, mainly from unregulated foreign sources, appear on the shelves of U.S. stores.

The proposed FTC Guides will encourage marketing deception by concealing from the public and the U.S. Consumer Products Safety Commission, the source of 25% of the manufacturing costs.

As a result, the public and CPSC tips might not be as vigilant as needed, because of the assumption that all products which bear the label "Made in USA" naturally contain raw materials that adhere to existing U.S. laws.

These 25% costs could easily be for unsafe lead-based paint or any other unsafe raw material.

---

From: Frank J. Altschul, Jr., 63 Boxwood Terrace, Red Bank, NJ 07701-6707  
To: FTC File No. P894219, "Made in USA Policy Comment".

- 3 -

# News from CPSC

## U.S. Consumer Product Safety Commission

Office of Information and Public Affairs

Washington, D.C. 20207

---

**For Immediate Release**  
**December 17, 1996**  
Release # 97-042

**Contact: Ken Giles**  
**(301) 504-0580 Ext. 11S4**

### **Wooden Toys Recalled Because of Lead Paint**

WASHINGTON, D.C. - In cooperation with the U.S. Consumer Product Safety Commission (CPSC), Oriental Trading Company of Omaha, Neb., is voluntarily recalling approximately 44,400 wooden toys because some of the paint on the toys contains high levels of lead.

CPSC standards ban toys containing high levels of lead. Young children might swallow lead if they chewed on these toys. Although no reports of illness or injury have been received, this recall is being conducted to prevent the possibility of lead poisoning.

Two types of wooden toys are involved in this recall. One toy is a set of 32 wooden beads with a cord for stringing the beads, packaged in a clear plastic bag labeled (in part): "OTC Item No. M-027/653 QTY: 1 PC MADE IN CHINA." The other toy is a set of six spinning tops, packaged in a clear plastic bag labeled (in part): "OTC ITEM N!3: M-027/294 QTY: 1 SET MADE IN CHINA."

These two toys were sold from September 1994 to November 1996 through the firm's catalogs for under \$4 and through retail stores.

Consumers who purchased these 'wooden toys from toy stores should return them for a full refund or full credit. Consumers who purchased the toys through Oriental Trading's **catalog** should call the company at (800) 228-0045 to obtain refund instructions.

The U.S. Consumer Product Safety Commission protects the public from unreasonable risks of injury or death from 15,000 types of consumer products under the agency's jurisdiction. To report a dangerous product or a product-related injury and for information on CPSC's fax-on-demand service, call CPSC's hotline at (800) 638-2772 or CPSC's teletypewriter at (800) 638-8270. To order a press release through fax-on-demand, call (301) 504-0051 from the handset of your fax machine and enter the release number. Consumers can obtain this release and recall information at CPSC's web site at <http://www.cpsc.gov> or via Internet gopher services at [cpsc.gov](http://cpsc.gov). Consumers can report product hazards to [info@cpsc.gov](mailto:info@cpsc.gov).

####

# News from CPSC

U.S. Consumer Product Safety Commission

Office of Information and Public Affairs

Washington, D.C. 20207

For Immediate Release  
March 11, 1997  
Release # 97-083

Contact: Nychelle White  
(301) 504-0580 Ext. 1192

## CPSC and Wear Me Apparel Corp. Recall Infant Boys' Rompers

WASHINGTON, D.C. - In cooperation with the U.S. Consumer Product Safety Commission (CPSC), Wear Me Apparel Corp. of New York, N.Y., is recalling about **30,000** Little Miracles™ rompers for infant boys. The paint on the rompers' cap snaps presents a potential lead poisoning hazard to young children. The paint on the cap snaps violates the ban on paint containing lead under the U.S. Consumer Product Safety Act.

Wear Me Apparel Corp. and CPSC are not aware of any injuries involving these garments. This recall is being conducted to prevent the possibility of injury.

Little Miracles™ rompers involved in this recall have style numbers 9448 or 9449 on the reverse side of the care label. These romper styles have three orange or red snaps at the neckline. The rompers are 100 percent cotton with short sleeves and a snap crotch.

Both styles are available in five sizes: 0-3 months, 3-6 months, 6-9 months, 12 months, and 18 months. The rompers have two sewn-in labels in the neck. One label identifies the Little Miracles™ brand and the other label displays RN 46795 and provides information on the garment's size, fiber content, and care.



---more---

(rompers)

- 5 -

**Kmart** stores nationwide sold the rompers beginning in October 1996 for \$4.44.

Consumers should return the rompers to any **Kmart** store for a full refund. For more information about this recall, consumers should contact **Wear Me Apparel Corp.** at **(800) 223-0777**.

**Little Miracles™** rompers with white, cream, pink, yellow, or blue snaps are not involved in **this** recall.

The **U.S.** Consumer Product Safety Commission protects the public from unreasonable **risks** of injury or death from 15,000 types of **consumer** products under the agency's jurisdiction. To report a dangerous product or a product-related injury and for information on **CPSC's** fax-on-demand service, call **CPSC's** hotline at **(800) 638-2772** or **CPSC's** teletypewriter at (800) 638-8270. To order a press release **through** fax-on-demand, call (301) S04-005 1 from the handset of your fax machine and enter the release number. Consumers can obtain this release and recall information at **CPSC's** web site at <http://www.cpsc.gov> or via **Internet** gopher services at [cpsc.gov](http://www.cpsc.gov). Consumers can report product hazards to [info@cpsc.gov](mailto:info@cpsc.gov).

####

# News from CPSC

U.S. Consumer Product Safety Commission

Washington, D.C. 20207

Office of Information and Public Affairs

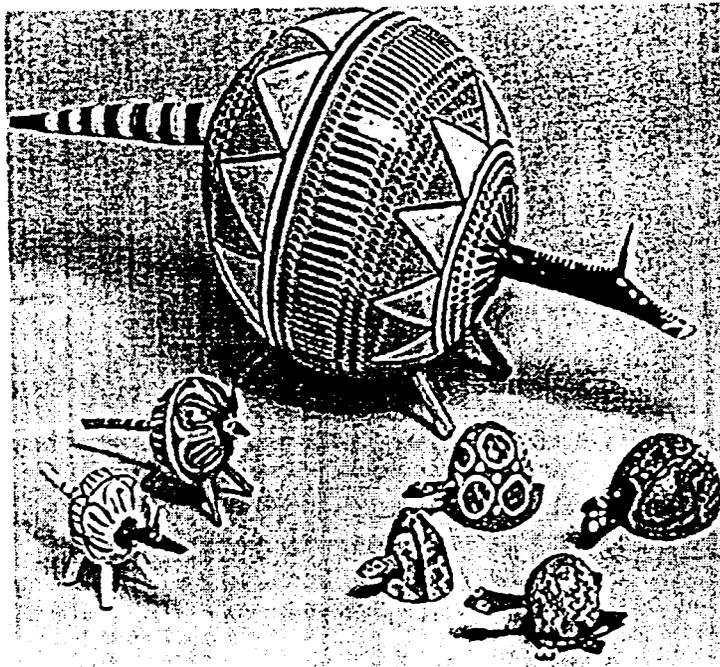
For Immediate Release  
April 2, 1996  
Release # 96-092

Contact: Kate Premo  
(301) 504-0580 Ext. 1187

## CPSC and The Americas Co. Announce Wooden Armadillo and Turtle Recall

WASHINGTON, D.C. - In cooperation with the U.S. Consumer Product Safety Commission (CPSC), The Americas Company of San Francisco, Calif., is recalling approximately 42,000 wooden armadillos and turtles. The products are hazardous because they contain a level of lead in the painted surface that violates the law and is dangerous to children if consumed.

The wooden armadillos and turtles, with bodies "measuring between one and four inches long, are made of dried gourds and are painted in various colors and patterns. The armadillos and turtles have movable heads and the larger armadillos also have movable tails. A sticker on the bottom of the armadillos and turtles reads, "Hecho En Mexico" ("Made in Mexico"). The large armadillos' hang tags read, "Folk Art \*\*\* The Nature Company, Berkeley, CA \*\*\* sku #696807 \*\*\* Item 696807 \*\*\* \$14.00/xxx."



Six retailers, including The Nature Company stores, sold the armadillos and turtles nationwide from May 1995 to February 1996 for between \$4 and \$14 each.

-more-

Consumers should immediately take ~~the~~ armadillos ~~and~~ turtles away from children and return ~~the~~ items to the store where purchased for a full refund or exchange. Consumers can also return armadillos and turtles with proof of purchase directly to The Americas Company, 1977 Union Street, San Francisco, Calif. 94123. The Americas CO. will exchange the product for a new one that meets CPSC standards. For more information, consumers should call The Americas at (800) ARTIFAX (278-4329) between 10:30 a.m. and 6:30 p.m. PT, Monday through Friday.

The Americas and CPSC are not aware of any injuries involving these products. This recall is being conducted to prevent the possibility of injury.

his matter came to CPSC's attention as a result of a referral from the Texas ,, Department of Health, Austin, Texas.

The U.S. Consumer Product Safety Commission protects the public from the unreasonable risk of injury or death from 15,000 types of consumer products under the agency's jurisdiction. To report a dangerous product or a product-related injury and for information on CPSC's fax-on-demand service, call CPSC's hotline at (800) 638-2772 or CPSC's teletypewriter at (800) 638-8270. To order a press release through fax-on-demand, call (301) 504-0051 from the handset of your fax machine and enter the release number. Consumers can obtain this release and recall information via Internet gopher services at [cpsc.gov](http://cpsc.gov) or report product hazards to [info@cpsc.gov](mailto:info@cpsc.gov).

####

D. The proposed guides side with the minority.

According to the statistics offered in the Proposed Guides Booklet, 64% of the Commenters to the invited review and workshop took an unqualified stand in support of the current "all or virtually all" standard.

The remaining 36% divided their opinions between favoring a percentage content standard and a "substantially transformed" in the U.S. criteria.

The proposed guides side with the 36 percenters.

The stand taken by this 36% was not only divided as described above but it was also very fragmented. One large group of 15 commenters offered no suggestions at all, only disagreeing with the current standard.

By contrast, the 64% majority took a unified and unqualified strong stand in support of maintaining the current "all or virtually all" standard.

I urge the Federal Trade Commission to side with this unified majority.

E. It is recommended. that some company comments be re-evaluated. It appears that 1997 actions contradict 1996 stated goals.

Example 1. In 1996 the New Balance Athletic Shoe Co. stated that for industry, given that there are strong economic incentives to move offshore and dramatically reduce labor and other costs, whatever advantage might accrue from use of the "Made in USA" label provides at least some incentive to stay in the U.S. to counterbalance the clear economic benefits of locating elsewhere. . . A standard allowing the use of "Made in USA" claims when a manufacturer uses a majority of domestic materials and labor would help to level a very uneven playing field.

In the 1996 Fall & Winter Mason Shoe Catalog (attached as pages 9 & 10) 4 New Balance shoes are featured. 3 were "Made in USA", Models 9103, 812 and 818-19. Even the "Crafted with Pride in USA" logo is shown. Only 1 shoe, Model 9106 was shown as "Imported."

In the 1997 Fall & Winter Mason catalog (attached as pages 11 & 12) the ratio is reversed. 6 New Balance shoes are featured. 5 are now listed as "Imported", Models 9103, 812, 9106, 9112 and 9150-55. Gone are the "Crafted with Pride" logos from the Models 9103 and 812. Now only 1 in 6 is listed as "Made in USA", Model 813-18-19. See Addendum below.

"Imported" is taken to mean both labor and materials are foreign.

Also note that the prices for Models 9103 & 812 remain the same as they change from "Made in USA" to "Imported". So much for a "savings" to U. S. consumers by offshore outsourcing.

Where did the "dramatically" reduced labor costs go?

---

From: Frank J. Altschul, Jr., 63 Boxwood Terrace, Red Bank, NJ 07701-6707  
To: FTC File No. P894219, "Made in USA Policy Comment".

Addendum to Example 1. I missed 3 New Balance shoes now listed in the women's section of the 1997 Mason Catalog. All 3 styles are "Imported".

Now the total is only 9 "Made in USA"



# MASON<sup>®</sup> SHOE

## Comfort Footwear

Vol. # 96M510S

Fall & Winter 1996



### Men's New Balance ENCAP II<sup>®</sup> Technology Is The Ultimate In Shock Absorbency

Underneath your heel is the amazing ENCAP II featuring a core of EVA surrounded by a shell of high-tech, contoured polyurethane. This combination adds stability, disperses shock, and provides excellent energy-return. U.S.A.

Style 9103 White/Grey/Teal "\$89.95

3M Scotchlite<sup>™</sup> Reflective Trim for nighttime safety

Padded Collar and Tongue

XAR 1000<sup>™</sup> Carbon Rubber Outsole, abrasion-resistant



Style 9103

*soft cushioned insole*  
(removable)

Rear-foot ENCAP II Midsole, high-tech shock absorbency

High-Tech Support Trim

Forefoot C-CAP<sup>®</sup> Midsole for superior energy-return stretch without losing strength

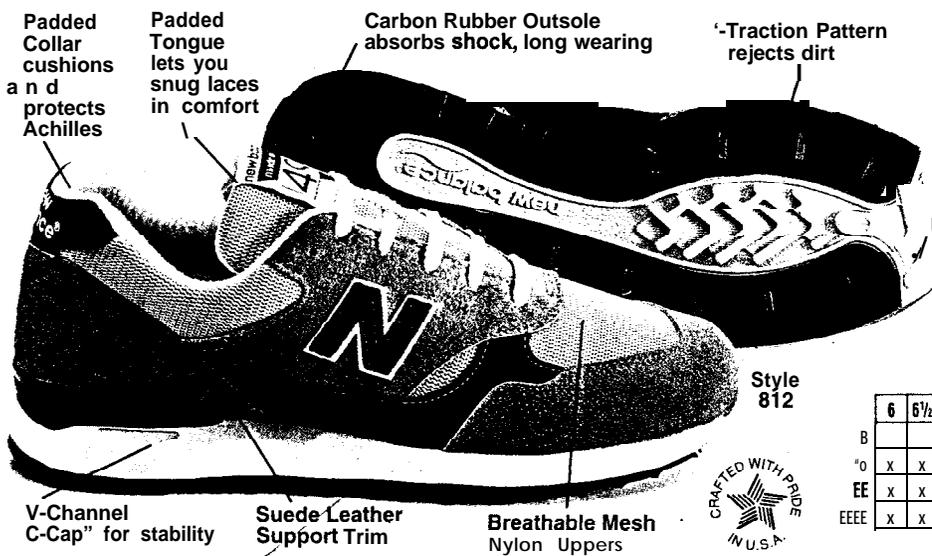
DYMETROL Fabric Uppers

Mason Has Your Size!

	7	7½	8	8½	9	9½	10	10½	11	11½	12	13	14
B			X	X	X	X	X	X	X	X	X	X	X
D	X	X	X	X	X	X	X	X	X	X	X	X	X
EE	X	X	X	X	X	X	X	X	X	X	X	X	X
EEEE	X	X	X	X	X	X	X	X	X	X	X	X	X

(Add \$2 for sizes 13 and larger)

### Men's New Balance Is Built For A Fitness Run Or An Evening Stroll



Padded Collar cushions and protects Achilles

Padded Tongue lets you snug laces in comfort

Carbon Rubber Outsole absorbs shock, long wearing

Traction Pattern rejects dirt

Style 812

A lot of people like the added support and cushioning a running shoe can provide, even if they're not runners. New Balance has beefed up the cushioning on this style just for those people. It contains their Lunar Pillar<sup>®</sup>, a contoured, cushioned insert. Carbon rubber outsole for exceptional durability. U.S.A.

Style 812 Grey/Navy Blue Mesh/Leather \$ 6 9 . 9 5

V-Channel C-Cap<sup>®</sup> for stability

Suede Leather Support Trim

Breathable Mesh Nylon Uppers



Mason Has Your Size!

	6	6½	7	7½	8	8½	9	9½	10	10½	11	11½	12	12½	13	14	15
B					X	X	X	X	X	X	X	X	X	X	X	X	X
D	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
EE	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
EEEE	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

(Add \$2 for sizes 13 and larger)



## Men's Velcro® Leather Walking Shoe

Get ready for the walk of your life in this exceptional cushioned walking shoe featuring convenient Velcro straps and Full Grain Leather Uppers. You'll notice a difference on your walk due mainly to New Balance's exclusive ROLLBAR STABILITY SYSTEM built into the heel to give extra structural integrity. U.S.A.

Style 818 Bone Leather \$84.95  
Style 819 Black Leather

Mason Has Your Size!

	7	7½	8	8½	9	9½	10	10½	11	11½	12	13	14	15	16
B					X	X	X	X	X	X	X	X	X	X	X
D	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
EEEE	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

(Add \$2 for sizes 13 and larger)

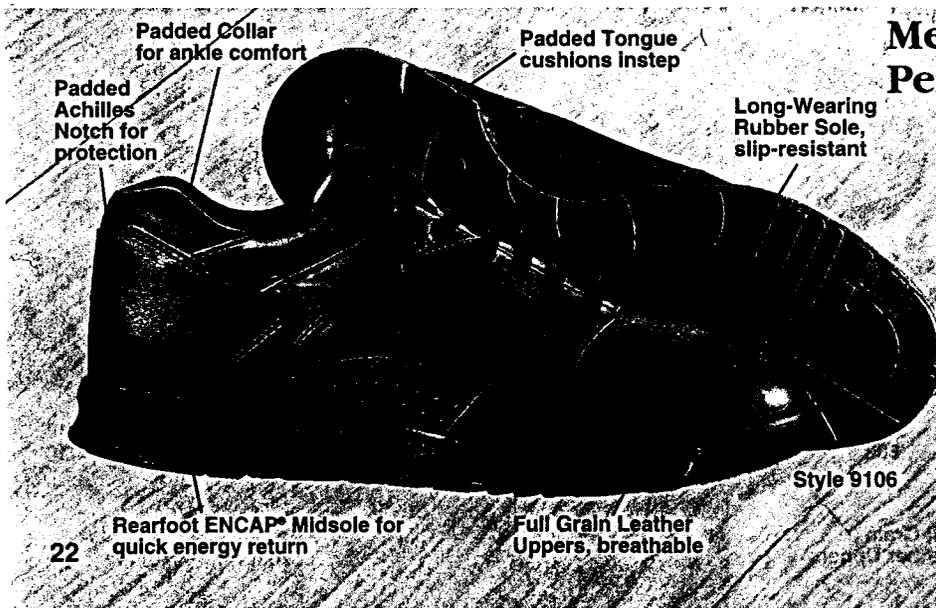


Style 818

Style 819



23



## Men's Leather New Balance Performance Walking Shoe

Take to the streets in total cushioned comfort in this high performance leather walking shoe. It features New Balance's rearfoot ENCAP® midsole, a unique shock-absorbing, energy-return suspension system. Removable cushioned insert. The further you walk, the more you'll appreciate the easy flexibility and high-mileage endurance built into this shoe. Imported.

Style 9106 Black Leather \$69.95

Mason Has Your Size!

	7	7½	8	8½	9	9½	10	10½	11	11½	12	13	14
D	X	X	X	X	X	X	X	X	X	X	X	X	X
EE	X	X	X	X	X	X	X	X	X	X	X	X	X
EEEE	X	X	X	X	X	X	X	X	X	X	X	X	X

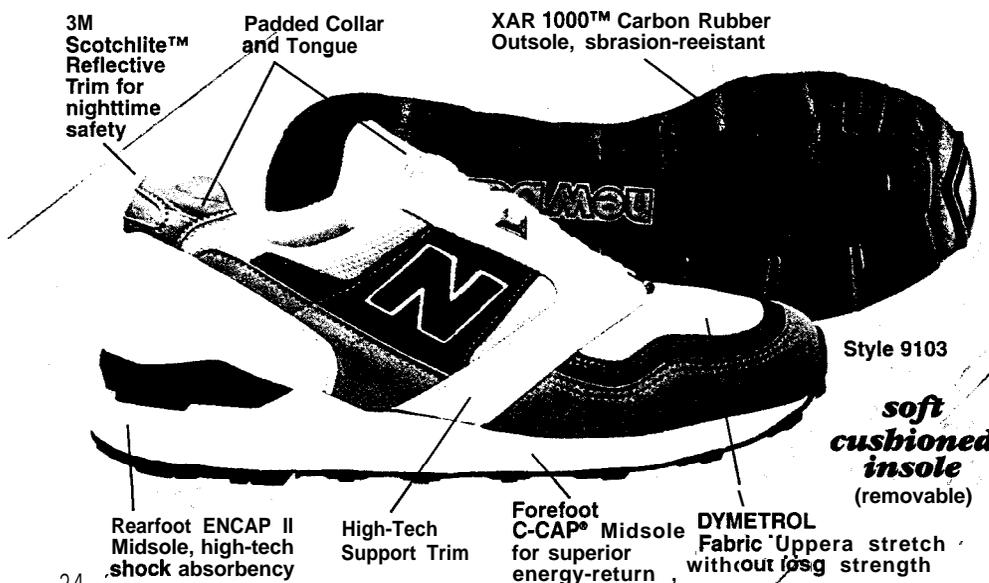
(Add \$2 for sizes 13 and larger)

Style 9106

22



Winter



### Men's New Balance ENCAP II® Technology Is The Ultimate In Shock Absorbency

Underneath your heel is the amazing ENCAP II featuring a core of EVA surrounded by a shell of high-tech, contoured polyurethane. This combination adds stability, disperses shock, and provides excellent energy-return. Imported.

Style 9103 White/Grey/Teal \$89.95

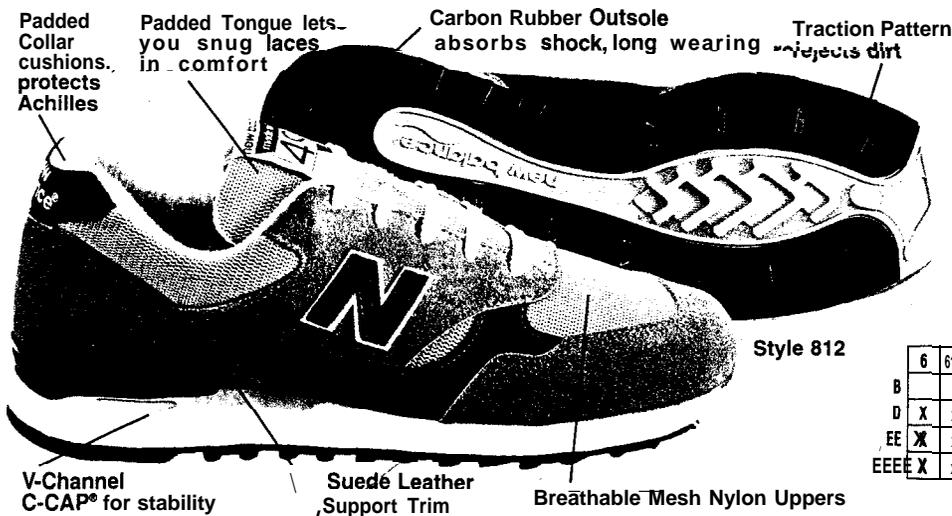
Mason Haa Your Size!

	7	7½	8	8½	9	9½	10	10½	11	11½	12	13	14
B			x	x	x	x	x	x	x	x	x	x	x
D	x	x	x	x	x	x	x	x	x	x	x	x	x
EE	x	x	x	x	x	x	x	x	x	x	x	x	x
EEEE	x	x	x	x	x	x	x	x	x	x	x	x	x

(Add \$2 for sizes 13 and larger)

24

### Men's New Balance Is Built For A Fitness Run Or An Evening Stroll



A lot of people like the added support and cushioning a running shoe can provide, even if they're not runners. New Balance has beefed up the cushioning on this style just for those people. It contains their Lunar Pillar®, a contoured, cushioned insert. Carbon rubber outsole for exceptional durability. Imported.

Style 812 Grey/Navy Blue Mesh/Leather \$69.95

Mason Haa Your Size!

	6	6½	7	7½	8	8½	9	9½	10	10½	11	11½	12	13	14	15
B					x	x	x	x	x	x	x	x	x	x	x	x
D	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
EE	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
EEEE	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x

(Add \$2 for sizes 13 and larger)



new balance **B**

ABZORB Sole Insert absorbs shock

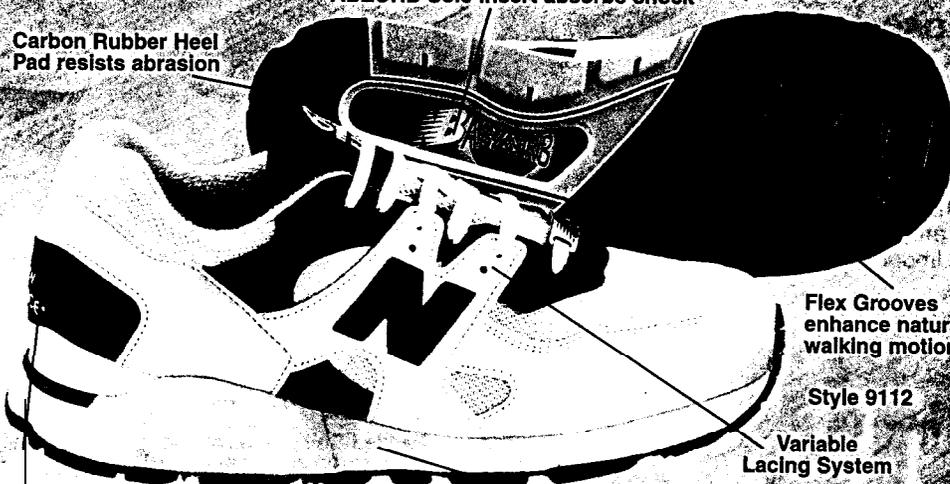
Carbon Rubber Heel Pad resists abrasion

soft cushioned insole (removable)

**Exceptional Shock Absorption And Stability With ABZORB® Insert**

Patented ABZORB® sole insert provides maximum energy return while resisting compression set. Cool, breathable nylon mesh upper with Leather Support Trim. Durable rubber sole with carbon rubber heel pad. Moisture-wicking Nylux lining. EVA foam cushion insole, removable. Imported.

Style 9112 White/Navy Leather/Mesh \$84.95



Flex Grooves enhance natural walking motion

Variable Lacing System

External Heel Counter for lateral stability

C-CAP® Midsole adds support and flexibility

**Mason Has Your Size!**

	7	7½	8	8½	9	9½	10	10½	11	11½	12	13	14
D	X	X	X	X	X	X	X	X	X	X	X	X	X
EE	X	X	X	X	X	X	X	X	X	X	X	X	X
EEEE	X	X	X	X	X	X	X	X	X	X	X	X	X

(Add \$2 for sizes 13 and larger)

Long-Wearing Rubber Sole, slip-resistant

Padded Collar and Tongue

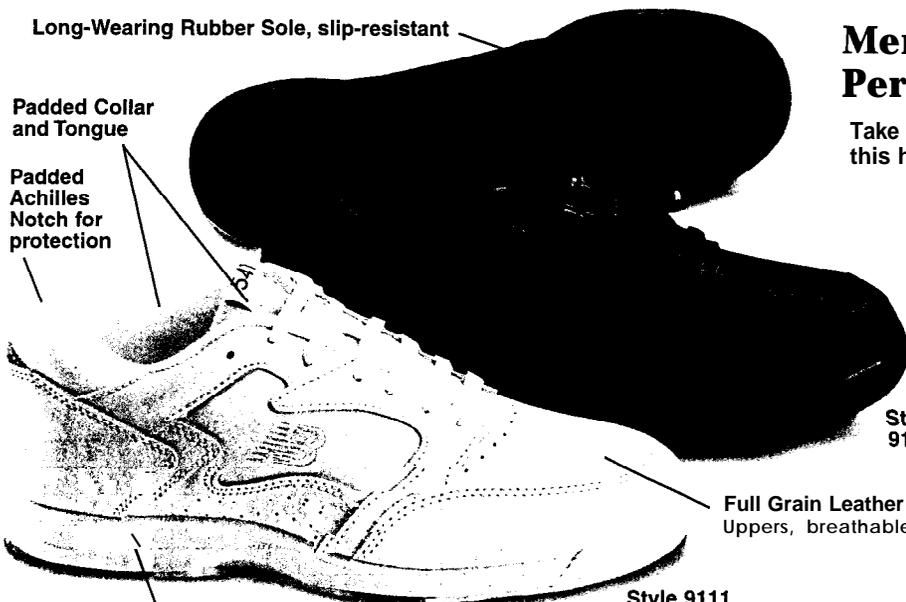
Padded Achilles Notch for protection

**Men's Leather New Balance® Performance Walking Shoe**

Take to the streets in total cushioned comfort in this high performance Leather Walking Shoe.

It features New Balance's rearfoot ENCAP® midsole, a unique shock-absorbing, energy-return suspension system. Removable cushioned insert. The further you walk, the more you'll appreciate the easy flexibility and high-mileage endurance built into this shoe. Imported.

Style 9106 Black Leather  
Style 9111 White Leather \$69.95



Style 9106

Full Grain Leather Uppers, breathable

Style 9111

Rearfoot ENCAP® Midsole for quick energy return

**Mason Has Your Size!**

	7	7½	8	8½	9	9½	10	10½	11	11½	12	13	14
D	X	X	X	X	X	X	X	X	X	X	X	X	X
EE	X	X	X	X	X	X	X	X	X	X	X	X	X
EEEE	X	X	X	X	X	X	X	X	X	X	X	X	X

(Add \$2 for sizes 13 and larger)

Further, in the 2 1997 L.L. Bean catalogs (attached as pages 14,15 & 16) 6 New Balance shoes are listed as being "New" for 1997. Of these new shoes, 4 are listed as "Imported", 1 as "Made in USA and Imported" and only 1 as "Made in USA".

Of the total of 12 New Balance shoes (all are not shown in the attached illustrations) featured in the 2 1997 L.L. Bean Summer catalogs, the largest number, 5, are listed as being "Imported", 3 as "Made in USA and Imported" and 4 as "Made in USA".

Example 2. In 1996, the Sunbeam Corp. stated that while manufactured or assembled in the U.S., a number of its products cannot be advertised as "Made in USA" because some small component is sourced from overseas.

However, 1997 newspaper headlines proclaimed that the Sunbeam Corp. was being completely made over by a new management team headed by a man so devoted to slashing costs by downsizing and moving manufacturing offshore that he has earned the nickname "ChainSaw".

I personally have been purchasing one Sunbeam product, the "Hot Shot", a reasonably priced hot water dispenser, for at least 15 years, perhaps more. I have been buying a new one about every two to three years as the old one burns out from almost continual use.

Every "Hot Shot" that we have purchased in 14 of those years has been labeled "Made in USA". The company has had no trouble sourcing "all or virtually all" of its materials from domestic sources and assembled the product with domestic labor . . . until 1997.

The current "Hot Shot" model states "Assembled in Mexico. Some components not of U.S. origin". I learned this after I had purchased what will be my last "Hot Shot".

In the past, most Sunbeam/Oster small appliances were "Made in USA". I am sure a check made today will disclose exactly the opposite.

Conclusion: It is my hope that the above facts and opinions will encourage the Federal Trade Commission to reconsider its proposed guidelines and return to the current standard of "all or virtually all" to denote "Made in USA".

Respectfully submitted,

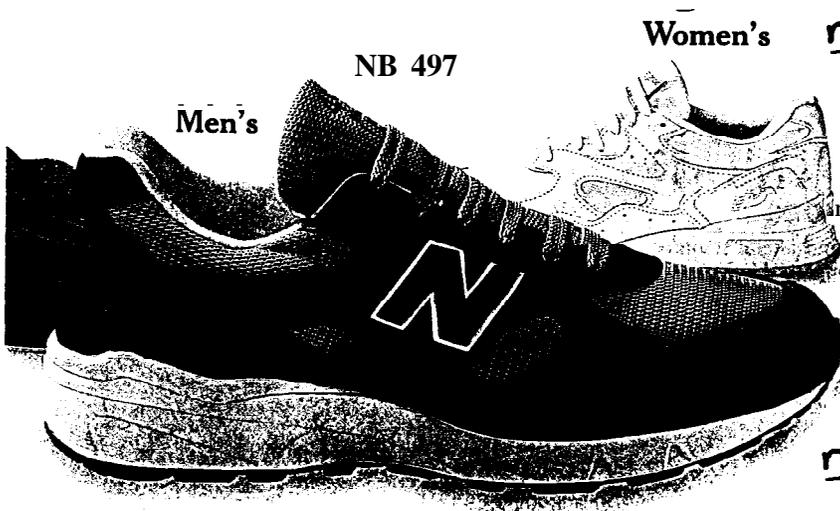


Frank J. Altschul, Jr.  
63 Boxwood Terrace  
Red Bank, NJ 07701-6707  
Tel : 732-747-5942

Ref : "Made in USA Policy Comment" FTC File No. P894219

# L.L.Bean®

## SUMMER 1997



NB 497

Men's

Women's

### new NB 497 Running Shoes

A good choice for light to moderate running and walking programs or casual wear. Provide excellent support at the heel and good forefoot flexibility. Molded EVA insert in midsole for effective shock absorption. Synthetic leather uppers are breathable, durable and will not retain moisture. Removable cushion insole. Carbon-rubber outsole. Made in USA or imported.

LH22064 Men's \$64.00

Whole and half sizes: 8 to 12, 13 Narrow B, 7 to 12, 13, 14, Medium D, Wide EE and X-Wide EEEE.

LH22131 Women's \$64.00

Whole and half sizes: 5 to 10, II, 12 Medium B, Wide D and X-Wide EE.

### new NB 851 Running Shoes

The best choice for runners who place a premium on stability. A graphite Rollbar™ in the midsole and patented thermoplastic post in the heel keep the foot centered and help reduce pronation. Special foam in heel and forefoot give excellent shock absorption. Durable carbon rubber outsole. Imported. Color: White.

LH22059 Men's \$84.00

Whole and half sizes: 7 to 12, 13, 14, 15 Medium D, Wide EE and X-Wide EEEE.

LH22129 Women's \$84.00

Whole and half sizes: 6 to 10, II, 12 Narrow AA, 5 to 10, 11, 12 Medium Band Wide D.



NB 851

Men's

Women's

### new NB 657 Multi-Use Shoes

Lightweight running-profile cross-trainers built for "forward motion" sports, such as step aerobics, treadmill workouts or outdoor running. Durable synthetic leather and mesh uppers give lightweight comfort and support. Padded collar and tongue. Molded heel counter for extra support. EVA foam midsole and encapsulated foam insert in heel for shock absorption. Removable insoles. Nonmarking rubber outsoles with toe bumper for added durability. Imported. Color: White.

LH22063 Men's \$69.00

Whole and half sizes: 7 to 12, 13, 14, 15 Medium D, Wide EE and X-Wide EEEE.

LH22130 Women's \$69.00

Whole and half sizes: 6 to 10, II, 12 Narrow AA, 5 to 10, 11, 12 Medium Band Wide D.



NB 657

Men's

Women's

### **New Balance Fit Information**

Please note: Our fit tests indicate you should order New Balance active footwear 1/2 size larger than your usual shoe size.

# from New Balance



new balance

## NB 570 Waking Shoes

NB's lightest walking shoe. Full-grain leather uppers. Contoured removable insole. Cushioned midsole and durable, nonmarking rubber outsole. Made in USA and imported. Color: White.

LH19668 Men's \$59.00

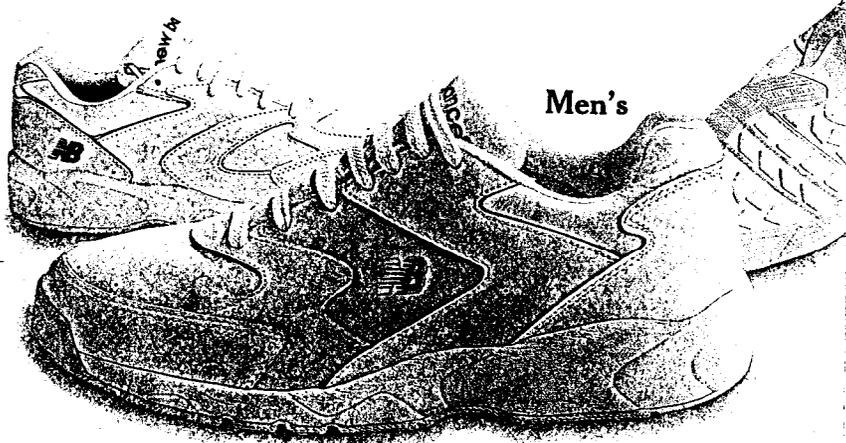
Whole and half sizes: 9 to 12, 13, 14, 15  
Narrow B, 7 to 12, 13, 14, 15 Medium D, .  
Wide EE and Extra-Wide EEEE.

LH22135 Women's \$59.00

Whole and half sizes: 6 to 10, 11, 12  
Narrow AA and Extra-Wide EE. 5 to 10,  
11, 12 Medium B and Wide D.

Women's

Men's



NB 570  
Walking Shoes

## new NB 645 Court Shoes

The same stability, durability and comfort required for tennis make these shoes a practical choice for everyday wear. Encap® midsole features an EVA foam core in a polyurethane shell to add stability and disperse shock. Sturdy insole board runs the length of the footbed for unsurpassed stability. Nonmarking rubber outsole and toe bumper for traction and durability. Imported. Color: White.

LH22065 Men's \$69.00

Whole and half sizes: 7 to 12, 13, 14, 15  
Medium D, Wide EE and X-Wide EEEE.

LH22133 Women's \$69.00

Whole and half sizes: 6 to 10, 11, 12  
Narrow AA, 5 to 10, 11, 12 Medium B  
and Wide D.

Women's

NB 645  
Court Shoes

Men's



## Men's Sperry® Topsiders

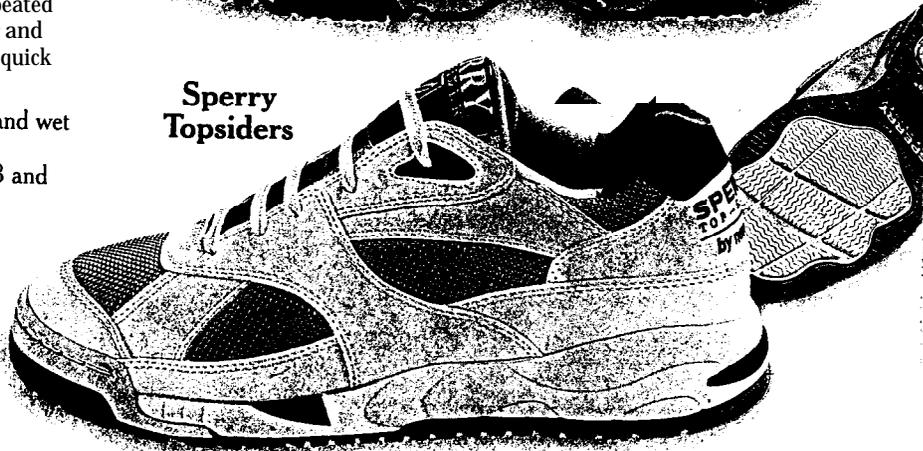
By New Balance-

The lightest marine performance shoes available today. Combine the fit and comfort of New Balance® athletic shoes with Sperry's new four-way-grip, nonmarking boat sole. Uppers of hydrophobic, breathable synthetic leather and mesh. Stay soft and comfortable even after repeated wettings in salt- or freshwater. Padded ankle collar and tongue. Cushioned, arched insole is removable for quick drying. Four-way grooved rubber outsole provides superior forward and lateral traction on fiberglass, and wet docks. Made in USA. Color: White.

Whole and half sizes: 7 to 12, 13, 14 Narrow B and Medium D. 7 to 12, 13 Wide EE.

LH22829 Men's \$69.00

Sperry  
Topsiders



Satisfaction Guaranteed  
To Order Call  
1-800-221-4221

# SUMMER 1997

## new NB 600

### Cross-Training Shoes

Lightweight cross-trainers with compression-molded EVA foam midsoles give the shock absorption needed for high-impact activities. Leather and mesh uppers for durability and breathability. Nonmarking rubber outsole. Removable insoles dry overnight. Imported.

Color: white.

EE22061 Men's \$59.00

Whole and half sizes: 7 to 12, 13, 14, 15  
Medium D, Wide EE and Extra-Wide EEEE.

EE22132 Women's \$59.00

Whole and half sizes: 6 to 10, 11, 12  
Narrow AA, 5 to 10, 11, 12 Medium B and Wide D.



Men's

NB 600  
Cross-Training Shoes

Women's

## new NB 800 Walking Shoes

These lightweight walking shoes for men and women feature an outsole designed specifically with the serious walker in mind. Soft, full-grain leather uppers. Cushioned C-Cap midsole with graphite Rollbar® provides exceptional cushioning and stability. Durable, flexible nonmarking rubber outsole. Contoured, removable insole. Made in USA.

Colors: Black (Women's only), white.

EE22072 Men's \$75.00

Whole and half sizes: 9 to 12, 13, 14, 15 NarTow B. 7 to 12,  
13, 14, 15 Medium D, Wide EE and X-Wide EEEE.

EE22137 Women's \$75.00

Whole and half sizes: 6 to 10, 11, 12 Narrow AA and  
X-Wide EE. 5 to 10, 11, 12 Medium B and Wide D.

## Men's NB Comfort and Postal Walkers

Made for anyone who walks or stands much of the day, especially on hard surfaces. Soft nappa leather uppers. Durable polyurethane outsoles. Dri-Lex® fabric lining wicks moisture. Made in USA.

Whole and half sizes: 8 to 12, 13, 14 Narrow B and Extra-Wide EEEE. 7 to 12, 13, 14 Medium D and Wide EE.

**Comfort** Same construction as Postal Walker below without USPS certification. Color: Brown.

**Postal** Meet U.S. Postal Service requirements for slip resistance, light weight and cushioning. Color: Black.

EE1 7625 Walkers

Comfort \$72.00 Postal \$72.00

## NB Run/Walk Shoes

Combine the lightweight stability of a running shoe with the comfort of a walking shoe. Breathable leather and mesh uppers. Contoured removable insole. Cushioned midsole and durable carbon rubber outsole. Imported.

Color: White.

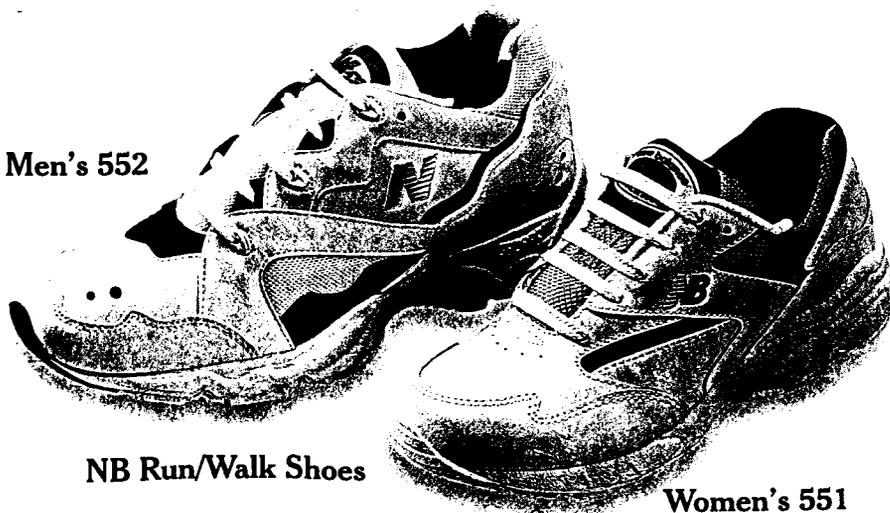
EE22073 Men's 552 \$64.00

whole and half sizes: 7 to 12, 13, 14, 15  
Medium D, Wide EE and X-Wide EEEE.

EE22136 Women's 551 \$64.00

Whole and half sizes: 5 to 10, 11, 12 Narrow  
AA, Medium B and Wide D.

Men's 552



NB Run/Walk Shoes

Women's 551

### New Balance Fit Information

Please note: Our fit tests indicate you should order New Balance footwear 1/2 size larger than your usual shoe size.