

Dyed Cultured pearls the artificial coloring and or removal of color should be disclosed as this is significantly affect the value. And the customer should have this information in order to make an informed decision. Coating of some cultured pearls is also becoming a more common practice one which I feel should be disclosed as these coatings can and in some cases do wear off very quickly living a dull lusterless surface which is not what one thinks of when thinking of pearls either natural or cultured. I have also seen references to lapidary treatment of cultured pearls to make them rounder, and more lustrous, this is also not in keeping with traditional cultivation practices and should be disclosed.

Platinum; the Guides should make a reference and defer to existing state laws once an item is in a state which has such a law. to (perhaps most appropriately as a footnote or in the appendix) to the existence of state statutes which also regulate Platinum group metals. this is similar to the notice of possible state law in the National gold and silver stamping act (Title 15 - COMMERCE AND TRADE CHAPTER 8 sections 300) “§300. Application of State laws; “All articles of merchandise to which sections 294 to 300 of this title apply which shall have been transported into any State, Territory, District, or possession of the United States, and shall remain therein for use, sale, or storage, shall, upon arrival in such State, Territory, District, or possession, be subject to the operation of all the laws of such State, Territory, District, or possession of the United States to the same extent and in the same manner as though such articles of merchandise had been produced in such State, Territory, District, or possession, and shall not be exempt therefrom by reason of being introduced therein in original packages or otherwise.”

the following states have such statutes in place;

A) California <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=bpc&group=22001-23000&file=22120-22132>

B) Illinois <http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=2344&ChapterID=67>

C) New York

[http://public.leginfo.state.ny.us/LAWSSEAF.cgi?QUERYTYPE=LAWS+&QUERYDATA=\\$\\$GBS234\\$\\$@TXGBS0234+&LIST=LAW+&BROWSER=BROWSER+&TOKEN=13716852+&TARGET=VIEW](http://public.leginfo.state.ny.us/LAWSSEAF.cgi?QUERYTYPE=LAWS+&QUERYDATA=$$GBS234$$@TXGBS0234+&LIST=LAW+&BROWSER=BROWSER+&TOKEN=13716852+&TARGET=VIEW)

D) New Jersey http://lis.njleg.state.nj.us/cgi-bin/om_isapi.dll?clientID=496326&Depth=2&TD=WRAP&advquery=platinum&depth=4&expandheadings=on&headingswithhits=on&hitsperheading=on&infobase=statutes.nfo&rank=&record={14BE6}&softpage=Doc_Frame_PG42&wordsaroundhits=2&x=59&y=10&zz=

E) Wisconsin <https://docs.legis.wisconsin.gov/statutes/statutes/134/33>

This information should be of no surprise to the trade as it was published in Elly Rosen's article "Showing Your Mettle", MJSA's AJM, May 1988

Table of Platinum, Gold and Silver marking laws:

U.S. Federal; Canada; Some U.S. States.

Glass filled Rubies and other glass filled stones; these should be considered as a manufactured or assembled product similar to the way garnet and glass doublets are considered. These "stones" have very different properties and have very special handling considerations which rubies do not. These special care requirements prevent typical repairs such as retipping over a ruby while it is in place, the use of acid based 'pickle' to remove oxides formed during soldering operation. These fillings may also be damaged by cleaning solutions which do not affect actual rubies would not affect rubies which have not been treated with a lead glass filling. This type of treatment is very different than heating, which is a treatment which has far greater acceptance within the industry and does not pose special handling considerations.

Weights of gemstones as used on diamond reports must comply with the guidelines on gemstone weight and the tolerances stated in the guides. At present this is not always the case with several Major gemstone reporting and diamond dealer associations imposing their own tolerances on reports.

Disclosure of gemstone treatment should be made prominently in the description of the stone, hiding disclosures as a footnote, another page, as a hyperlink or only on an invoice given to the customer at the end of the sale. Disclosures should be specific as to the nature and amount of treatment Not just a comment that "this stone has been treated by one or more of the following..." should not be allowed.

Gemstone treatment disclosures by consumers to repairmen should also be considered. In my opinion this is similar to having consumers disclose odometer mileage when it is sold and whether it accurately represents the mileage on a vehicle. This is also a point which might be addressed as a footnote or in the appendix.

Handmade Jewelry There is a comment which asks for the definition of 'Handmade to include certain casting techniques and sintering form 'precious metal clay' I am opposed to this as the process of rolling drawing and forging techniques alter the internal structure of the metal resulting in what I am of the opinion are improved properties. The described casting and sintering techniques do not result in this improved metal structure.

Coin Silver 90% silver 10% copper is a traditional silver alloy and one which was used in US coins for many years. this alloy should be allowed to be stamped as 'coin silver' or similar wordage, something which the current guides do not allow. As for silver with lesser content I would oppose.

Less than 10K gold I am opposed to allowing stamping of alloys less than 10K. This change has been submitted many times before and each time it has been rejected, for what I feel have been good reasons. Both tradition and corrosion resistance are reasons I would oppose this change.

As for the desirability of having these guides I am of the opinion that the guides are of great benefit to the jewelry industry and have had a very positive affect at a minimum cost to both jewelers and consumers, although I cannot cite actual cost analysis to support this. If one is committed to dealing with the consumer public in a fair and honest manner the Trade Guides are not a hindrance and do remind us of issues which should be addressed. IF one is trying to deceive then they are a burden, especially those issues which have been specifically addressed due to past abuse (such as the current controversy over lead glass filling of rubies and other gemstones).