

RICHLINE GROUP

A Berkshire Hathaway Company

August 7, 2012

Donald S. Clark
Secretary
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

Jewelry Guides, 16 CFR Part 23, Project No. G711001

Dear Secretary Clark:

On behalf of our firm, the largest manufacturer of precious metals products in the US, we respectfully request your consideration for an extension of the August 27th deadline for filing of comments by the industry.

We ask this primarily to develop substantiation, through further research, in the areas of plating, plated, coated, bonded, filled, etc.-clearly overlapping, conflicting and confusing terms to all these days-especially to the consumer. The permutation and combinations of the above, resulting from the quadrupling of gold and silver prices since the FTC last compiled the guides, is daunting.

Through the combined resources of the Precious Metals taskforce, we are at a stage of reviewing our recommended processes to insure the optimal clarity, minimal operational/production difficulty and measureable rules.

Your cooperation would be sincerely appreciated in allowing us this short extension, to the end of September, to complete this stage with all avenues explored and substantiated.

Regards,



Mark Hanna
Chief Marketing Officer

CC: Laura Kim, Assistant Director
Reenah L. Kim, Attorney
Bureau of Consumer Protection, Division of Enforcement