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The Federal Trade Commission
Office of the Secretary
Room H-113 (Annex O)
600 Pennsylvania Avenue N.W.
Washington, D.C. 20580

Via e-mail: <https://ftcpublic.commentworks.com/ftc/jewelryguidesroundtable>

Re: Jewelry Guides, 16 CFR Part 23
Project No. G711001
Comments of Jewelry Television

On behalf of America's Collectibles Network, Inc. d/b/a Jewelry Television® ("JTV"), we appreciate the opportunity to submit comments responsive to the questions posed in the Federal Register notice issued by the FTC and published in the Federal Register on May 6, 2013 regarding the FTC review of the Jewelry Guides. JTV's comments are responsive only to questions 1-4. We have not conducted any consumer research regarding the questions and our information is based solely upon our company experience and 20 years of customer interface.

We join with the other commenters including JVC in believing that gold alloy product with gold fineness of less than 10K can be properly called gold so long as its specific gold fineness is properly disclosed. We believe however that disclosure of gold fineness of less than 10K should be permitted in the stamping on the product itself. We believe that stamping of the product benefits both the consumer and the marketer. In any event, we believe that subsection 23.4(b)(9) of the Guides should be revised to allow use of the term "Gold" to describe a product

that is composed throughout of less than 10K fineness, so long as the fineness is properly disclosed, either in marketing materials or by stamping on the product itself.

We also favor continued use of the description of content of gold by karat weight, as that is the term understood by consumers to describe the amount or fineness of gold in the product. While the description by percentage has merit, it would require a lengthy process to be understood by the consumer.

JTV's responses to questions 1-4 are as follows:

1. JTV believes that JVC's proposal relating to a revision in the Guides to allow sellers to sell as gold product with a gold fineness of less than 10K, provided that the actual gold content is disclosed in marketing materials, provides adequate guidance for marketers to avoid deception. However, JTV believes that stamping on the product itself is valuable for informing the consumer of the gold fineness of the product and avoiding deception; and that such stamping should not be prevented.

2. JTV believes that stamping a quality mark on a jewelry product to convey information about its precious metal content is not more likely to lead to consumer deception than if such information were included in descriptive marketing materials. We believe that stamping the quality mark on the product itself is best for both the consumer and the marketer. However, in the absence of allowance of a mark on the product itself, identifying gold fineness of less than 10k, we believe that information included in descriptive marketing materials is adequate to fully inform consumers.

3 & 4. See above comments.

Again we appreciate very much the opportunity to comment.

Respectfully submitted,

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Vice Chairman