



August 13, 2008

**The Federal Trade Commission
Office of the Secretary
Room 135-H (Annex E)
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580**

RE: Jewelry Guides, Matter No. G711001

Dear Sirs,

I am writing in my capacity as President of the World Jewelry Confederation, CIBJO. Our association members are national jewelry trade associations from around the world. As articulated in our mission statement, "CIBJO's purpose is to encourage harmonization, promote international cooperation in the jewellery industry, and to consider issues which concern the trade worldwide. Foremost among these is to protect consumer confidence in the industry."

CIBJO standards are published in the form of "blue books" on subjects pertaining to the trade in diamonds, color gemstones, laboratory practice, etc. The process to develop these blue books is a consultative one, requiring consideration of inputs from a wide array of experts on the products, and all sectors of the jewelry trade. These books usually take time to develop, and then are subject to a strenuous approval process, governed by CIBJO procedures.

Once published in blue book form, CIBJO standards are adopted by international jurisdictions. They are considered the definitive international standards that will be applied by the international trade. If a CIBJO member is found to be in violation of these standards, they are no longer allowed membership in the Association.

Promoting consumer confidence and fairness in the trade is the driving force that motivates the publications of Blue Book standards. While creating a level playing field for trade practices is important, preventing consumer deception is of paramount concern.

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Consumer confidence in our products and the manner in which they are sold is central to the creation of blue book standards. Therefore, the FTC's view that these standards are not based on deception or fairness standards is not supported by the facts.

Recently, CIBJO published a blue book on precious metals, including platinum. This publication was the result of an extensive consultative process, led by Michael Allchin, Chief Executive and Assay Master at the Birmingham Assay, United Kingdom. The Birmingham Assay, established by an act of Parliament in 1773 is one of only a few authorized entities in the UK permitted to apply hallmarks to precious metal goods. Hallmarking of all precious metal items are required by law in the UK, whether made in the UK or imported from abroad.

In developing the blue book on precious metals, his team included representatives from all sectors of the jewelry trade, and gold silver and platinum producers. The proposal was introduced to the membership for approval, was subject to the review process and unanimously adopted in 2008.

The CIBJO Blue Book standard for platinum restricts the use of the word "platinum" to alloys containing no fewer than 850 parts per thousand pure platinum. This has been the traditional practice in our industry for generations, and is the only fair practice that will work to avoid consumer deception. The ISO recognized standards for platinum finenesses are 999; 950; 900; 850 parts per thousand by weight. There is no internationally recognized fineness standard for platinum of 585 parts per thousand. The ISO standards are not prescriptive about the non-platinum metals that make up the remainder of the alloy. While many platinum alloys contain other 'platinum group metals' such as palladium, iridium and ruthenium, others regularly contain copper and cobalt.



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CIBJO has reviewed the FTC's proposal to allow the use of the word "platinum" to describe alloys made of platinum which have a fineness of 585 or less parts per thousand by weight of platinum. We respectfully oppose such a standard since in the view of CIBJO it will lead to consumer confusion, and will facilitate deceptive trade practices. Further, it is entirely inconsistent with international standards, leading to unnecessary obstacles and impediments to trade. Certainly, no member of CIBJO will be permitted to sell these products as 'platinum' without violating CIBJO conditions of membership, national laws, and international treaties on precious metals.

CIBJO therefore respectfully opposes an amendment of the Guides as proposed by the FTC and recommends that the use of the word "platinum" be used to describe only those alloys that have a minimum content of 850 parts per thousand by weight of platinum.

Thank you for your consideration of this letter.

Respectfully submitted,

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A rectangular area that has been redacted, obscuring the name of the sender.

Gaetano Cavalieri

President

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