

I am concerned about a provision of the Proposed FTC Guides for marketing platinum jewelry. As I understand it, for jewelry made from alloys containing less than 85% and at least 50% platinum, consumers must be told that the jewelry may not have the same attributes as traditional platinum jewelry made from platinum group metals unless the company selling the product has “competent and reliable evidence that its platinum/bass metal jewelry has the same attributes as traditional platinum jewelry”. In that case it would not be required to include this disclosure. I strongly disagree with the idea that a such a disclosure is not ALWAYS warranted.

As a bench jeweler and store owner for over 40 years I submit that there is virtually no likelihood that a non- traditional platinum alloy formulation will ever have the “same attributes” as an all platinum group alloy (traditional). My concern is simply that false claims not be allowed in the marketplace. For instance one familiar to the jewelry world might easily imagine an advertisement with the following claim: “14 karat platinum-- same as traditional platinum but at only half the price!!!” In my view, the only thing conceivably accurate about such a marketing claim might be the price.

In truth it is conceivable that a metallurgist might develop platinum alloys that contain less than 850 parts per thousand (ppt) that could improve on certain characteristics of traditional alloys. These claims have actually been made in the traditional platinum alloy world. A number of years back 950 platinum with Cobalt was introduced to improve casting qualities and polish-ability and to meet the world standard for being called “Platinum”. But there were some downside issues:

1. The alloy is magnetic (not helpful, as iron filings at the bench can be attracted and melted into the alloy leading to degradation).
2. The alloy discolored (tarnished) when heated which very different from the traditional Platinum-Iridium which does not discolor on heating).
3. Soldering problems are associated with the cobalt alloy.

This is an example of a 950 ppt alloy that would not meet the standard of having that same attributes as “traditional platinum jewelry”.

My recommendation: Make mandatory the disclosure for all platinum alloys with less than 850 ppt that the jewelry will not have the same attributes as traditional platinum jewelry made with platinum group metals. Such a disclosure is the most honest representation of reality. As one concerned with a fair and honest marketplace, a fair representation of the truth is critical.

Thank you for your time and work on this matter. If you wish to talk with me further on this matter I can be reached at work at:

W. Stephen Brown
Brown Goldsmiths & Company