



May 19, 2008

ORIGINAL

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

Re: Green Packaging Workshop – Comment, Project No. P084200

The Society of the Plastics Industry, Inc. (“SPI”)¹ is pleased to have the opportunity to provide additional comments on the FTC’s Guides for the Use of Environmental Marketing Claims (the “Green Guides” or “Guides”)² and the public workshop held by the FTC on April 30, 2008 (“Workshop”). As SPI indicated in comments that it previously filed in this proceeding on February 11, 2008, SPI actively supports the FTC’s initiatives to study and develop guidance on environmental marketing claims.

SPI submits these additional comments to correct apparent misstatements and misperceptions regarding the SPI resin identification code (“RIC”) and expand on SPI’s earlier comments regarding the need for flexible standards to promote the dissemination of truthful and non-misleading information about environmental attributes and impacts of products and activities.

COMMENTS

A. Misstatements and Misperceptions Regarding the SPI RIC

SPI appreciates the meaningful discussions that occurred at the Workshop, as well as the general acknowledgement that more education is required to discourage the spread of misleading environmental marketing claims. SPI was extremely troubled by some of the statements and references made about the SPI RIC during the Workshop, however. Thus, SPI is pleased to have this opportunity to provide some additional background and information on the RIC.

SPI developed the RIC in the 1980’s at the request of state regulators, recyclers and others to provide an effective method by which manufacturers and end users of rigid plastic containers could identify the basic material resin composition of plastic containers for sorting and recycling purposes. A description of the RIC and instructional video are available for

¹ Founded in 1937, The Society of the Plastics Industry, Inc. is the trade association representing one of the largest manufacturing industries in the United States. SPI member companies comprise the entire plastics industry supply chain, including processors, machinery and equipment manufacturers and raw materials suppliers.

² See 72 FED. REG. 66,091, 66,091 (Nov. 27, 2007).

viewing at <http://www.plasticsindustry.org/outreach/recycling/2124.htm>. Two additional guidance documents that SPI prepared and disseminated in 1991 are attached hereto as Exhibit 1. The SPI RIC is not and was never intended to be a symbol of "recyclability"; rather, it was intended to provide a useful means of identifying different types of plastics. Use of the SPI RIC is required by law in 39 states and is recognized worldwide.

The majority of plastic packaging at the time the RIC was developed involved one of six resins: polyethylene terephthalate (PETE); high density polyethylene (HDPE); polyvinyl chloride (PVC or vinyl); low density polyethylene (LDPE); polypropylene (PP); or polystyrene (PS). The SPI RIC assigns each of these resins a number from 1 to 6. The SPI coding system also includes a seventh code, "other," which indicates that the product in question is made with a resin other than the six listed above, or is made of more than one resin used in combination. Market developments in materials has resulted in a need to consider additional codes; that process is underway through ASTM International (formerly the American Society for Testing and Materials International ("ASTM")), as we describe later in these comments.

From the outset, SPI has offered explicit guidelines as to the proper sizing and positioning of the RIC on containers and bottles. Specifically:

- The RIC should be molded, formed or imprinted on all containers that are large enough to accept the 1/2" minimum-size symbol and all containers between eight-ounce size and five gallons; and
- The RIC should appear on the bottom of the container, as close to the center as feasible, so that it can be quickly located and easily identified.

These requirements reflect those mandated by state law. To ensure that the code appears on the container itself, it must be embossed on the mold. SPI estimates that the collective value of the molds used to produce plastics with the required RIC symbol is over one billion dollars.

The RIC was not intended to be, nor was it ever promoted as, a guarantee to consumers that a given item bearing the RIC will be accepted for recycling in their community. Thus, SPI has further provided that:

- The RIC should be applied where it will be inconspicuous to the consumer at the point of purchase so it does not influence the consumer's buying decision; and
- "Recyclable" and other environmental claims should not be made in close proximity to the code, even if such claims are properly qualified.

These guidelines were adopted before the FTC Green Guides were developed, and the Guides properly recognize that inconspicuous use of the SPI RIC is not an environmental claim.

As SPI explained in its previously filed comments, SPI is undertaking work to expand the RIC to address new types of plastics, materials, and combinations through an initiative at a nationally recognized third-party standards organization, ASTM. SPI first began discussions with ASTM regarding the development of an ASTM standard practice on resin identification codes in the Fall 2007. A formal presentation was made to ASTM Committee D20 on Plastics at its April 2008 meeting. Other initiatives planned for the near future include a co-authored press release, a webinar with participants of ASTM Subcommittee D20.95 this summer, and a work group meeting at the next ASTM meeting in November.

The SPI RIC is widely recognized throughout the United States. As noted above, to date, 39 states³ have adopted legislation regarding the use of the resin identification codes on bottles of 16 ounces or more and rigid containers of 8 ounces or more consistent with the SPI code.⁴ In addition, China has adopted a National Standard on Packaging Recycling Marks, which stipulates the types, names, sizes and colors of marks for recyclable, reusable, and renewable packaging.

SPI and its member companies have always taken the position that if the RIC is unduly prominent on the product, or is linked to a particular environmental claim, the claim or claims, both express and implied, must be substantiated. Nevertheless, it remains critical that the FTC confirm its longstanding position that inconspicuous use of the SPI RIC is not an environmental claim. Any action to the contrary would contravene the powers granted to the FTC and existing state laws, would impose an undue burden on the plastics industry and its customers given the molding process required to assure that the SPI RIC appears on rigid plastic containers in accordance with state law. We continue to believe that enforcement action is appropriate where these requirements are not met, and SPI is committed to working with the FTC to expand educational efforts in this area. The concept of FTC "warning letters" mentioned during the workshop may be an option to consider in this regard.

B. Alternative Qualifiers for "Recyclable" Claims

In its earlier comments, SPI suggested the need for renewed consideration of disclosures about "recyclability" to assure that truthful information about the ability to recycle products is provided. Some Workshop participants discussed the "substantial majority" standard for recyclability that is currently reflected in the Guides. Not only is this standard inconsistent with global standards, but a qualifier such as "This bottle may not be recyclable in your area" or "Recycling programs for this bottle may not exist in this area" is not likely to provide any incentive for consumers to take affirmative action to find out where the item might be recycled. SPI therefore urges the Commission consider whether alternative qualifiers, including qualifiers predicated on references to informative, accurate websites, would provide companies an alternate means to truthfully communicate even somewhat limited recyclability of products to consumers, including considering how the Internet might provide a means to offer consumers more accurate information about the availability of recycling facilities than can be provided on a typical container where label space is limited.

SPI is pleased that a number of Workshop participants acknowledged that consumers seek information about recyclability on the Internet. Indeed, as SPI indicated in its earlier comments, one of the most significant changes in the marketing landscape since the Green Guides were last revised in 1998 has been the proliferation of information available via the Internet, and the ease with which consumers visit websites to obtain more information. Both broader use of the Internet by consumers and a resurgence of interest in acting on their individual

³ Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Hawaii, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Jersey, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Virginia, Washington, and Wisconsin.

⁴ Wisconsin requires use of the code on bottles of 8 ounces or more.

environmental concerns suggest that consumers might respond differently to different qualifiers today than they did when the FTC last studied the issue of consumer behavior in response to particular claims where recycling facilities may not be available to a substantial majority of consumers or communities.

We urge the Commission to assess whether advertising that encourages consumers to visit a website for accurate, up-to-date information on recycling options available to them might both empower consumers to educate themselves about recycling options (which they are more likely to do if affirmatively reminded on the product or its packaging) *and* provide them the necessary roadmap by which to find recycling information quickly and readily, without a significant risk of prompting undesirable consumer behavior (*e.g.*, putting an item that cannot be recycled locally into the curbside recycling bin without checking). This would appear to be consistent with the Commission's goals of allowing truthful information to flow freely to consumers.

Workshop participants also discussed the recovery rates for packaging materials in general, noting that rates were stagnant. Some commented on the increasing proportion of the packaging waste stream that is composed of plastics. From a technical perspective, virtually any plastic is capable of being recycled, but the economics of doing so vary widely for different materials. SPI believes that it is critically important to find ways to recycle, reuse and reduce use of resources, recognizing that economics plays an enormous part in the feasibility of recycling of any given material. SPI respectfully submits that the best, and perhaps only, way to improve the recycling rate for plastics is to enhance consumer education. As energy costs continue to rise, however, it is critically important to also recognize the potential for mixed plastics materials in particular to be collected for waste-to-energy uses. Expanding waste-to-energy-initiatives will help reduce the amount of materials sent to landfills, and also capture the remaining British Thermal Unit (BTU) value in plastics.

CONCLUSION

SPI appreciates the opportunity to submit comments in this proceeding, and applauds the Commission for initiating this review of the Green Guides. SPI is particularly pleased to have the opportunity to submit comments on specific issues that arose during the Workshop, in particular certain misstatements and misperceptions regarding the SPI RIC. SPI believes that the Guides as a whole have been an important tool in promoting responsible, sound, and accurate environmental marketing, but recommends that the Commission consider whether additional education and enforcement actions are needed to discourage the spread of misleading environmental marketing claims.

Respectfully Submitted,

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October 1, 1991

Technical Bulletin

Supplement to RPCD-13

VOLUNTARY GUIDELINES RIGID PLASTIC CONTAINER MATERIAL CODE SYSTEM

This supplement is published to clarify RPCD-13 guidelines for the selection of the proper code for rigid plastic containers made from particular material, and for selection of the proper size of code related to the size of the container bottom.

The SPI Plastic Container Material Code System is recommended for use on all rigid plastic containers of a size of eight fluid ounces or larger. It is intended for consumer packages which may be collected for recycling. It is expected containers over five gallons would not be used as a consumer package, and need not be coded. The code is intended to assist the recycler in sorting containers by material, to obtain a higher value, single resin stream. The system is intended to encourage recycling of all plastic bottles and rigid plastic containers, by making it easier for the recycler to sort and obtain a higher value for all containers collected.

The RPCD-13 guidelines specify a minimum size of $\frac{1}{2}$ " for the code symbol, so that recyclers can easily read the code. These guidelines should be followed unless there is a significant technical problem with any eight ounce or larger container bottom not having enough room. Then the code should still be as large as possible. It is not helpful to recyclers to put a code smaller than $\frac{1}{2}$ " on containers under eight ounces. The value of the resin is not worth the time needed to read a small code and sort that container.

The guidelines also specify that if a container is made from a single resin material which can be recycled with all other containers of that material, it should carry that basic code. That will be helpful to recyclers by letting them obtain a higher value for the material if that container carries the basic single resin code. Where containers from the same mold are sometimes made from a different material, the code should be changed in that mold to match the different material. It is not helpful to recyclers to use code #7-OTHER if the container is one of the basic materials to be coded #1 to #6, and should be recycled as such.

Plastic container producers and users should be aware of and comply with any federal, state or local law which may specify decision guidelines different from these recommendations.

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RPCD—13—1989
Revision 1
October 1, 1990

Technical Bulletin Voluntary Guidelines Rigid Plastic Container Material Code System: Mold Modification Drawings



PETE



HDPE



V



LDPE



PP



PS



OTHER

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1.0 PURPOSE

The Society of the Plastics Industry (SPI) has developed a voluntary coding system for plastic containers, to identify material type. The purpose of coding is to assist recyclers in sorting plastic containers by resin composition. The system is intended for voluntary use by bottle and container producers, to be molded or formed or otherwise imprinted onto the bottom surface of plastic containers.

This container coding system has been created and is recommended to the industry to provide a consistent national identification mark that meets the needs of the

recycling industry, as defined by the recyclers and collectors themselves. The system is designed to be most convenient for the people who will sort containers, and is intended to avoid a complicated system which would require extensive worker training and possibly lead to confusion and/or mis-sorting.

Given today's national marketplace, it is crucial that the coding system be standardized nationally. The use of different code systems by various companies or states could significantly disrupt the flow of commerce.

To the best of our knowledge the information contained herein is accurate. However, The Society of the Plastics Industry, Inc. assumes no liability whatsoever for the accuracy or completeness of the information contained herein. Final determination of the suitability of any information or material for the use contemplated, the manner of use and whether there is any infringement of patents is the sole responsibility of the user.

This test method or practice may involve hazardous materials, operations, and equipment. This test method does not purport to address all of the safety measures associated with its use. It is the responsibility of the user of this method to establish appropriate safety and health practices and determine the applicability of any federal, state, and local regulatory limitations prior to use.

2.0 BACKGROUND

THE PROBLEM OF SOLID WASTE

One of the most pressing environmental issues is the mounting problem of solid waste disposal. Communities across the country are facing the issue of how to dispose of a growing volume of municipal waste efficiently and responsibly. In many areas, the lack of landfill space or proper incineration facilities has created the need to reduce the volume of household waste.

THE ROLE OF RECYCLING

More and more, recycling is playing a role in solving community waste disposal problems. Many states, counties, cities and smaller communities are recognizing that recycling can noticeably reduce the volume of waste to be handled by landfills and incinerators. They note recycling can also save on landfill use fees and transportation costs, and reuse valuable natural resources. Many new laws, regulations and public education programs are designed to encourage consumer participation in community recycling projects.

RECYCLING RIGID PLASTIC CONTAINERS

Rigid Plastic Containers are injection molded or thermoformed containers used to package and deliver any product to a customer, including food service packages. Rigid plastic containers are not a large part of the waste stream, but their use is growing. Currently, almost a third of municipal waste is paper products, with another third being organic and food waste. Plastic materials of all kinds represent about seven percent of the municipal waste stream, half of which is plastic packaging. Plastic containers, however, are one of the components of household trash which can be recycled, along with newspapers, aluminum cans and glass containers.

The predominant plastic recycling systems in place today are geared towards handling separate plastic materials, which are primarily polyethylene terephthalate (PET) from soft drink bottle and high density polyethylene (HDPE) from milk bottles. Markets for these materials are well developed, and increased volume should be possible. This has come about because soft drink and milk bottles are readily identified by their size, shape and color, and are easily separated from other plastic containers. They are also available in large volume, together representing more than one third of all plastic bottles.

The remaining volume of plastic containers are made from a variety of resin materials, including PET and HDPE. These, however, are not readily identifiable by size and style, and are not easily separated for processing by the current recycling systems. The challenge to the plastics industry has been to assist in solving the solid waste disposal problem by finding a way to make these other plastic containers more recyclable.

NEEDS OF RECYCLERS

To determine the most appropriate way to aid recyclers and collectors to separate plastic containers for processing, a survey was conducted among a large portion of the recycling industry. The results indicated that while not all recyclers could handle sorting, a significant portion would benefit by having a system to visually identify container material. After evaluating various methods, this recommended system was determined to be the most practical and the most helpful to recyclers and collectors.

The code system identifies the six most common plastic container materials, and applies to large containers representing perhaps 70 percent of all container resin. This is intended to encourage sorting which will result in reasonable volumes of higher value recyclable material. All other large containers, including multi-material, can be grouped with smaller containers and can be recycled as "mixed" or "other" plastics. A recently-developed successful technology which makes use of these mixed plastics is in use in some areas and is expected to grow.

3.0 DESIGN AND USE

The Rigid Plastic Container Material Code System is designed to be easy to read at a glance and distinguishable from existing marks put on rigid plastic containers by manufacturers for use in processing and identification. The basic part of the system uses a triangular-shaped symbol composed of three arrows with a specific number in the center to indicate the material from which the container is made. The number-material equivalents are:

- 1 = PETE (polyethylene terephthalate) (PET)
- 2 = HDPE (high density polyethylene)
- 3 = V (vinyl/ polyvinyl chloride) (PVC)¹
- 4 = LDPE (low density polyethylene)
- 5 = PP (polypropylene)
- 6 = PS (polystyrene)
- 7 = OTHER

The number code is then supplemented by the common letter identification for the various resins under the symbol, to serve as a constant verification of the material sorted, and for additional identification of actual material when necessary.

¹ The container code letters for polyethylene terephthalate and polyvinyl chloride are different from the standard industry identification letters in order to avoid confusion with registered trademarks.

3.1 Application

3.1.1 Containers - The material code should be molded, formed or imprinted on all containers that are large enough to accept the 1 / 2 inch-minimum size symbol. In any case, the symbol should be applied to all containers of eight ounce size or larger. The code should be on the bottom of the container, as close to the center as is feasible considering design, other marks, and customer requirements for clear areas. Placing the code in a similar location on all containers will allow those sorting them to quickly locate the code and identify the material.

Containers consisting of more than one resin may carry the code of the basic resin if the combination of materials is known to perform the same as the basic material in current recycling systems and normal reuse applications. Otherwise, use of the code "7 OTHER" is recommended.

3.1.2 Lids - It is recommended the material code be applied to all lids of 50 in² or larger. The code should be applied on the top or the underside of the lid, as close to the center as possible. Producers may voluntarily put the code on lids smaller than 50 in², so long as the minimum 1/2 inch symbol size is maintained.

3.2 Voluntary Timing

The material identification code is intended to be molded or formed into all rigid plastic containers of appropriate size, including those made from existing molds. To accommodate this procedure without substantial disruption of production schedules, it is suggested that molds can generally be modified to add the code at a time they would be off-line for other reasons. **However, the Rigid Plastic Container Division is recommending that all appropriate container and lid molds be modified by JULY 1,1990.**

3.3 Symbol Size

3.3.1 Containers - The size of the triangular arrow symbol should be a minimum of 1 / 2 inch and a maximum size of 2 inches, to which letters under the symbol are added, for ease of reading at a glance and for consistency. Smaller sized symbols may be used on eight ounce and larger containers with special or restrictive base or bottom designs. This recommendation does not include using smaller sized symbols on containers less than eight ounces. Specific size recommendations are as follows:



1/2 inch symbol for any container up to 34 fluid ounces

PETE

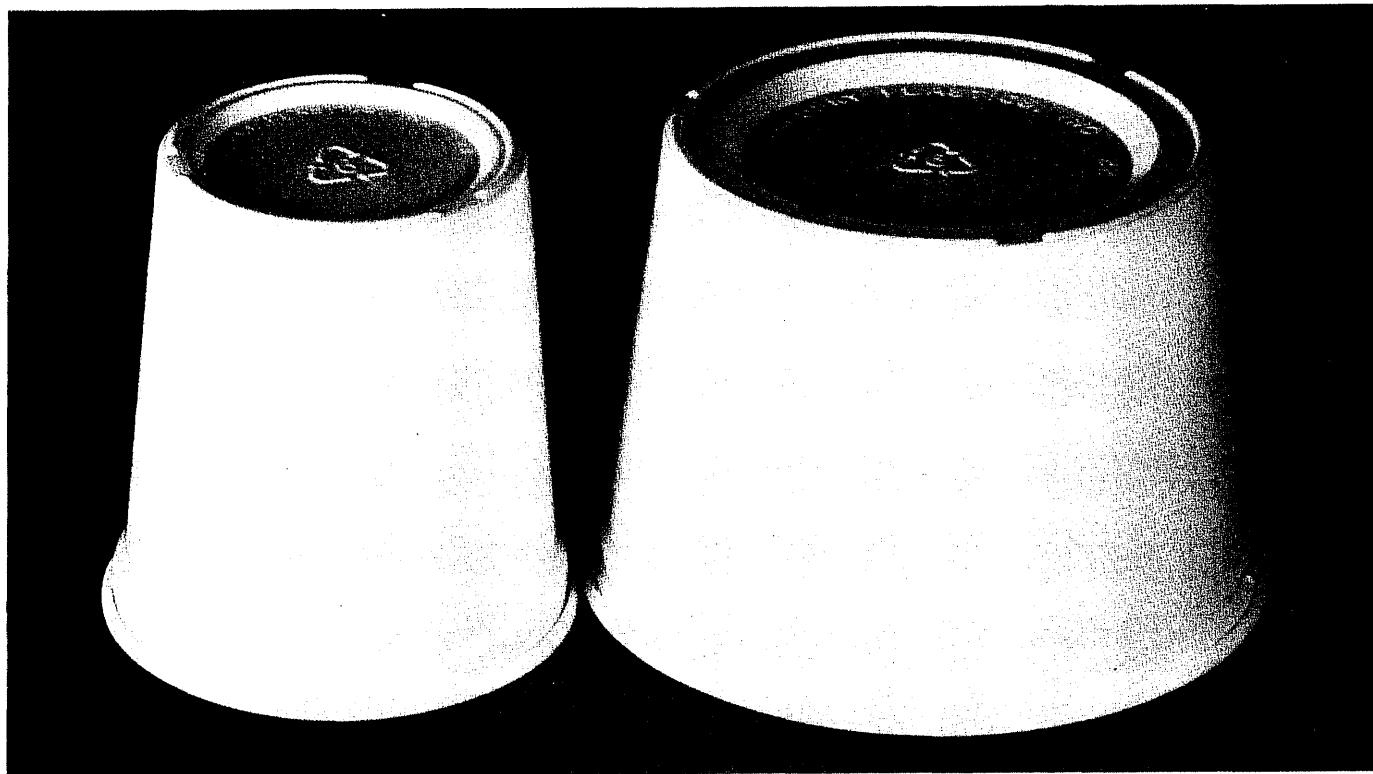


HDPE



1-2 inch symbol for one gallon and larger containers, actual symbol size being proportionate to the size of the container bottom

V



8 Ounce and 16 Ounce Rigid Plastic Containers With Molded Codes

3.3.2 Lids - Symbol size should be a minimum of 1 /2 inch on lids of 50 in.' and a maximum size of two inches, the actual size being proportionate to the area of the lid.

4.0 MOLD MODIFICATION

4.1 Containers

New and existing molds used in either injection molding or thermoforming should be marked by one of several methods: stamping, engraving or sandblasting. The selection of the method depends on the material and the flatness of the mold surface and on the capabilities of the mold shop.

4.1.1 Mold Stamping - Some new and existing molds, with mold surfaces which are not hardened, may be marked with a hardened stamp.

Care should be taken to firmly hold the stamp to insure a good impression overall with sufficient depth for satisfactory readability of the molded symbol. This depth may be from .003 to .012 of an inch, depending on the contrast with the surrounding surface.

Hardened stamps may be purchased from a quality engraving shop familiar with stamp fabrication techniques. Alternately, an experienced moldmaker may be consulted for assistance in

making or locating stamps. This method will not be satisfactory for molds where the symbol must be applied to a curved surface.

4.1.2 Mold Engraving - Molds that have hardened surfaces, or where the surface to be marked is not flat, will not be able to be marked using the stamping method. These will need to have the symbol applied by a different method such as engraving.

Engraving can be done by most moldmakers or by an engraving shop familiar with mold fabrication techniques for injection molding and thermoforming.

Master drawings for the creation of engraving masters are included with this technical bulletin. The symbol drawing and numbers/letters drawings are separate, both at eight times scale for a 1 /2 inch symbol. Complete full scale photo masters are also included for convenient use for this or other purposes.

4.1.3 Sandblasting - Sandblasting the symbol onto the mold can be done by most mold shops.

On some molds, particularly thermoforming molds, the mold surface is already sandblasted and the use of a sandblasted symbol would not be readily visible. When modifying existing sandblasted molds, the symbol should be engraved.

For new molds, the symbol should be stamped or engraved prior to sandblasting the mold surface. The symbol should then be masked for protection during the sandblasting operation.

4.2 Container Lids

Most new and existing molds for container lids should be marked by one of two methods, sandblasting or polishing - the selection depending on the surface of the mold. When lids need to be clear for printing or decorating, they should not be stamped or engraved because these methods may have a tendency to disturb the surface. When decorating is not a factor, lid molds may be modified by any appropriate means.

Both sandblasted and polished molds may have a tendency to wear and may require increased maintenance for continued clarity of the symbol.

5.0 IMPRINTING

Under special circumstances where mold modification is not technically feasible, the symbol may be imprinted on the bottom of the container or the top of the lid through the use of appropriate container marking or decorating equipment suitable for logos or special symbols. Care should be taken to use permanent inks, applied to surfaces appropriately conditioned to retain the mark through the entire container handling system to the recycler. This method should not be used to mark the underside of lids where the contents of the container may come in contact with the imprint.

6.0 QUALIFICATIONS

6.1 Implementation

The Society of the Plastics Industry, Inc., (SPI) is promoting a voluntary guideline for a plastic container material code system as a public service. The plastics and packaging industries, recyclers and the general public will be informed of the system through news releases, copies of this technical bulletin, or other appropriate means. The system is available to any company or person to use as appropriate.

However, use of the system is voluntary. SPI is not responsible for implementation of the system by container producers or users. Proper use of the system is the sole responsibility of each manufacturer that chooses to use it.

6.2 Recyclability of Containers

Neither the recommendations of SPI to code containers by material, nor the presence of a resin code on a container, conveys any guarantee, either expressed or implied, that any particular container is suitable for recycling into any particular product. The suitability of a recycled resin for a particular application will depend upon the demands of the application and the nature of any contamination resulting from prior container use. Furthermore, even within a resin type, virgin materials are manufactured with specific properties to meet the needs of specific applications. It is expected that the initial market for recycled resins will be for those applications that are tolerant of the variations in properties that exist among the various resins of each type that are represented in the waste stream.

6.3 Change in Material

If the resin used to produce a particular style of container is changed, it is the responsibility of the manufacturer to change the code to match the new resin. As noted above, use of the symbols on plastic containers is totally voluntary, and producers are free to change resins for particular containers as they see fit. The code is intended to relate solely to the resin type from which the container is made, and does not relate to the contents of the container, its shape or appearance.

6.4 Legal Status

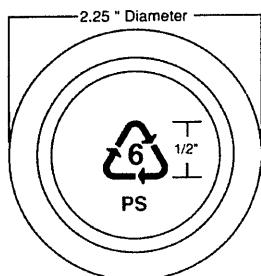
The plastic container material code guidelines are intended to promote uniform identification of resin materials in the absence of conflicting requirements. SPI does not guarantee that use of these guidelines will assure compliance with requirements of every jurisdiction that has adopted a resin coding law. Discrepancies that exist between state laws and the voluntary guidelines are highlighted in Plastic Bottle Institute's "Report on State Laws, Plastic Container Material Coding" available from the SPI Literature Sales Department.

6.5 State Mandatory Coding Requirements

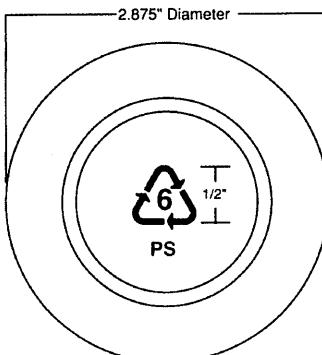
Since this voluntary resin coding system was developed, a number of states have adopted mandatory resin coding requirements. SPI makes no representation, expressed or implied, that the voluntary system will satisfy specific state requirements. Each manufacturer, distributor and user of rigid plastic containers is responsible for determining the coding requirements and compliance deadlines applicable to it and the containers it makes, distributes or uses.

7.0 SYMBOL SIZE/LOCATION GUIDELINES

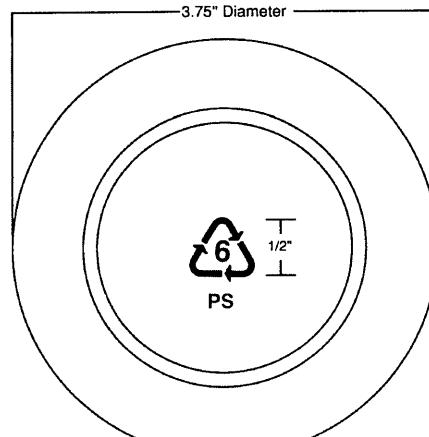
Symbols should be located as close to the center of the container bottom as is feasible. This is necessary to achieve national consistency among a large variety of rigid container styles. These illustrations are general guidelines for selection of appropriate sizes and location of symbols on other container styles.



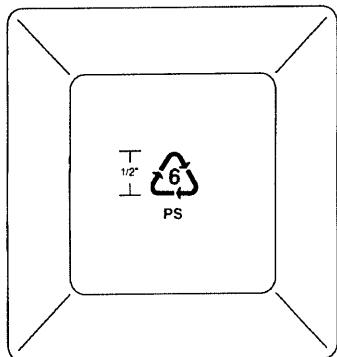
8 Ounce Cup



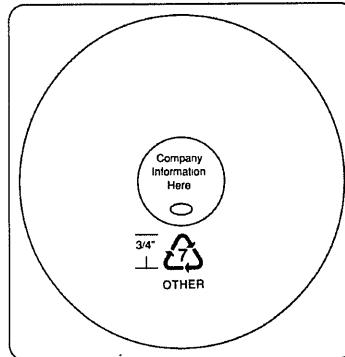
8 Ounce Tub



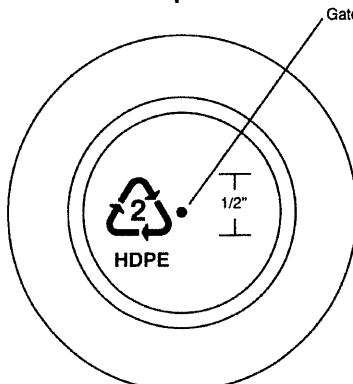
8 Ounce Squat



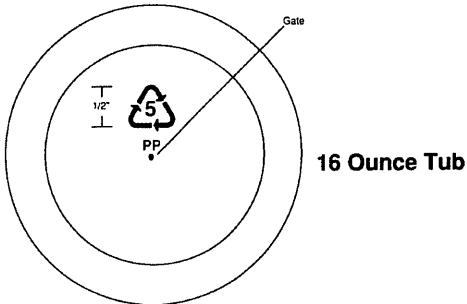
4 Inch HIPS/EPS Clamshell



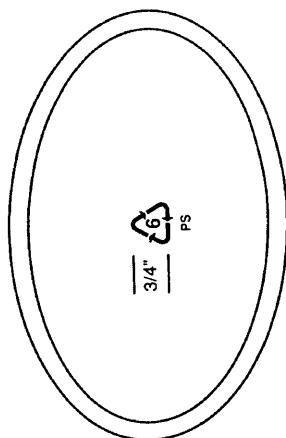
8 Inch COEX Platter



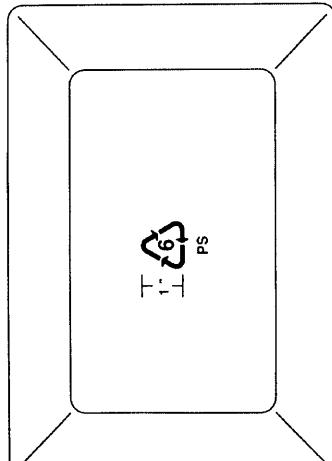
16 Ounce Cup



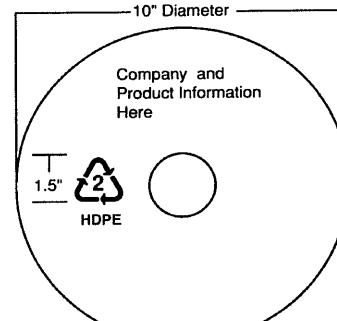
16 Ounce Tub



9 Inch HIPS/EPS Platter

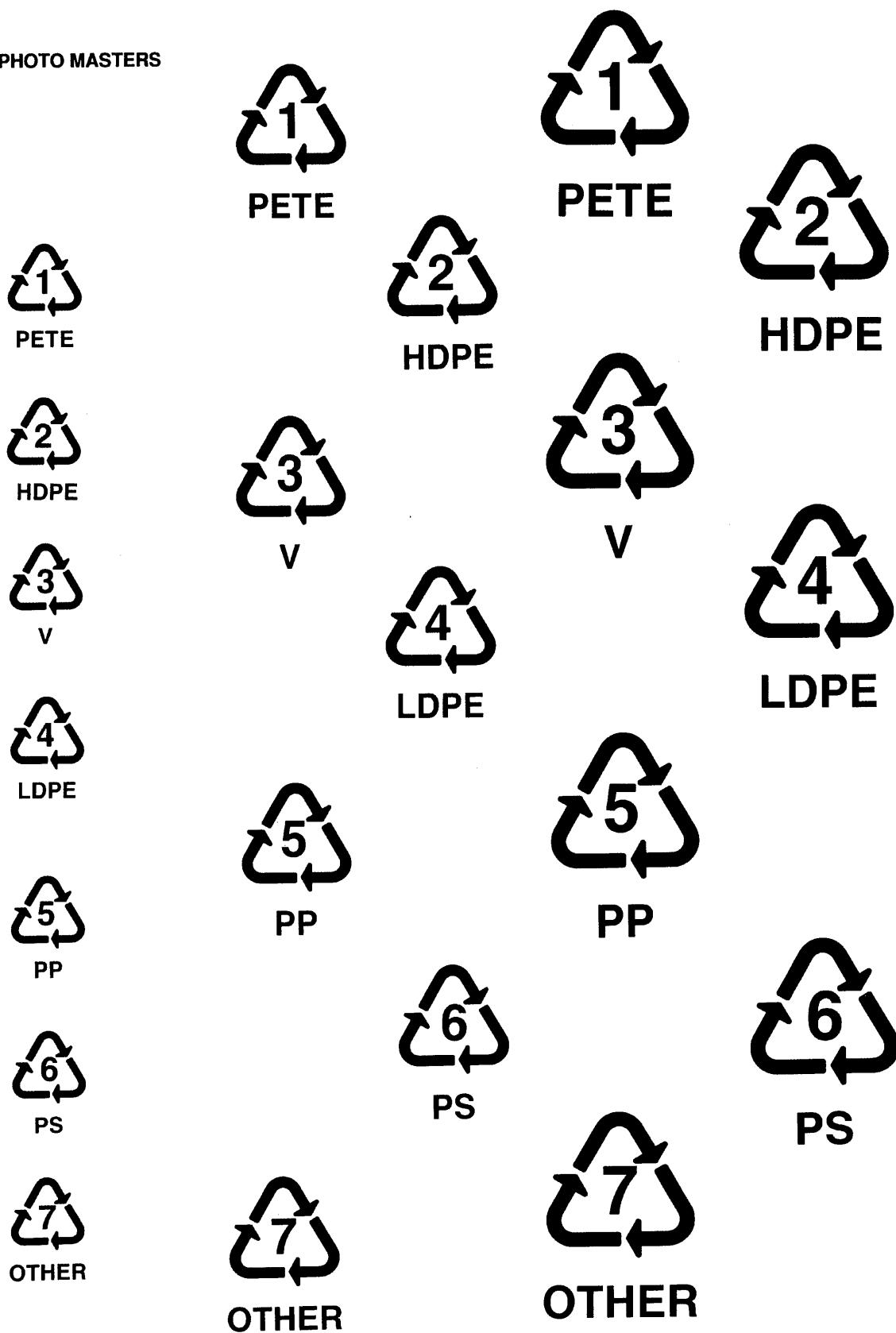


10 Inch HIPS/EPS Clamshell



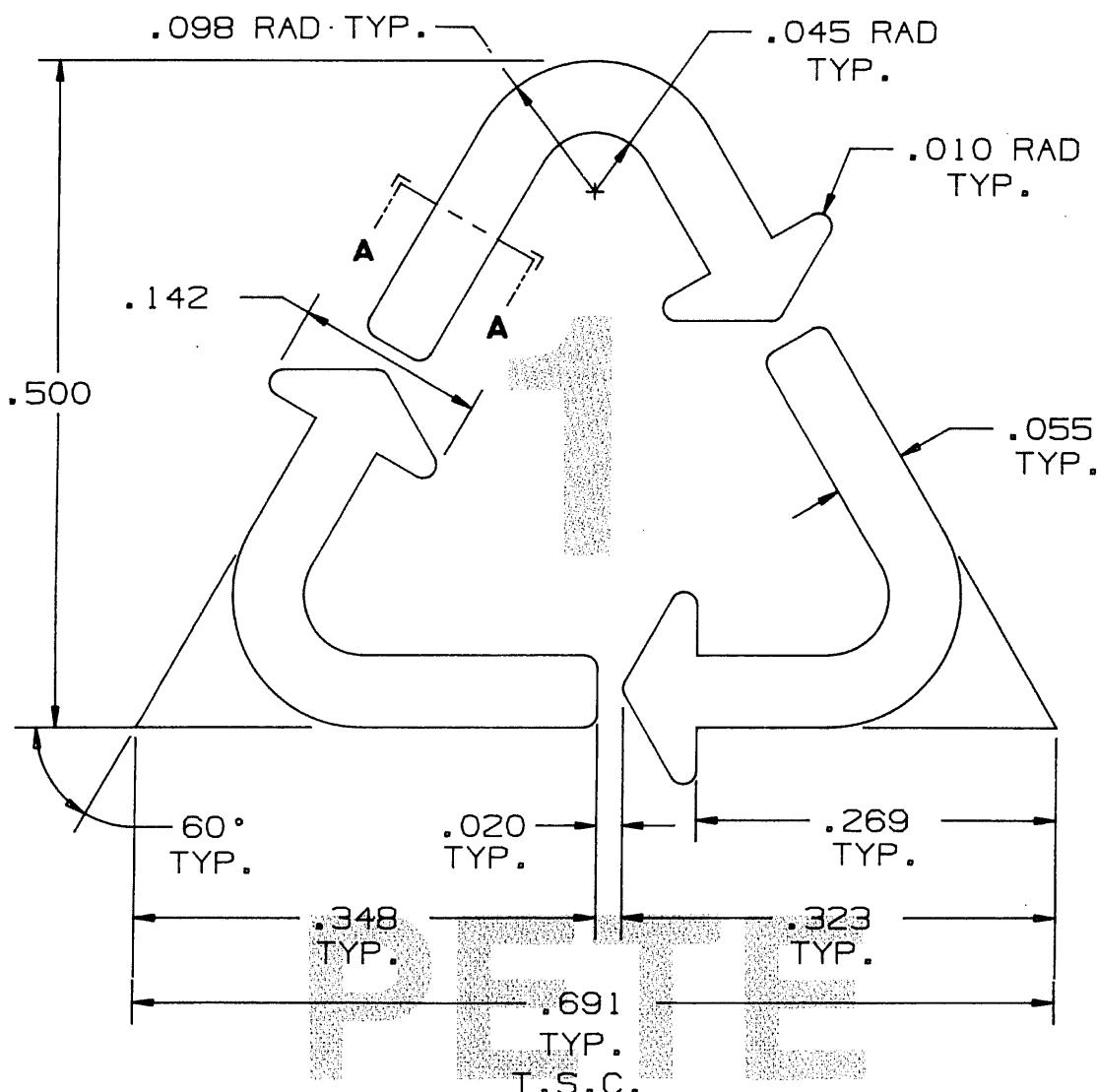
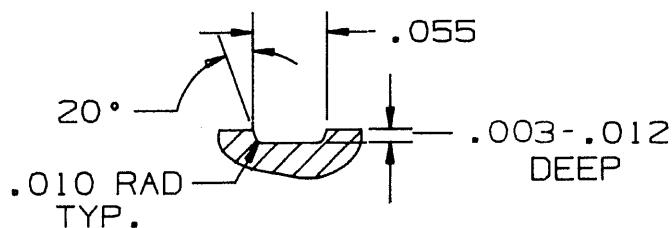
4 Gallon Bucket

8.0 PHOTO MASTERS



9.0 ENGRAVINGS MASTERS**9.1 Symbol**

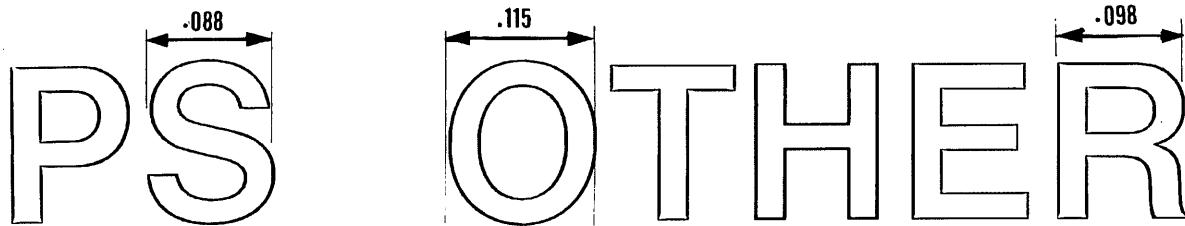
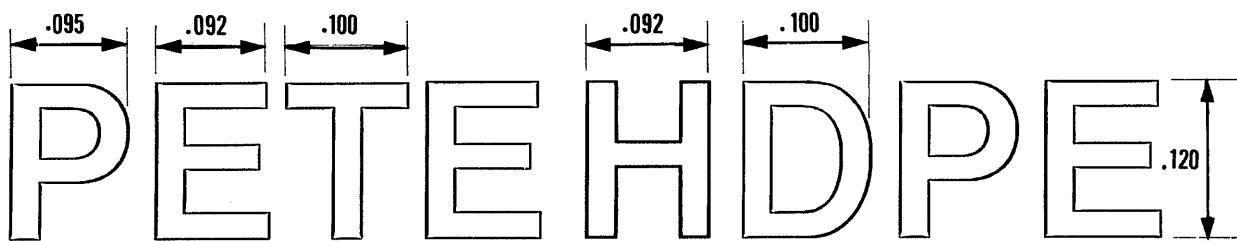
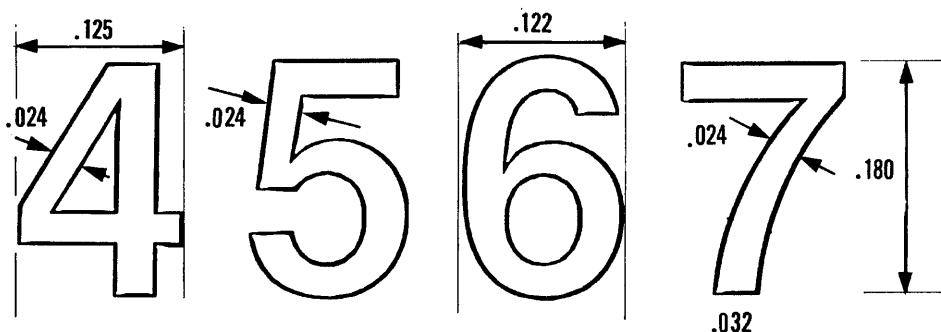
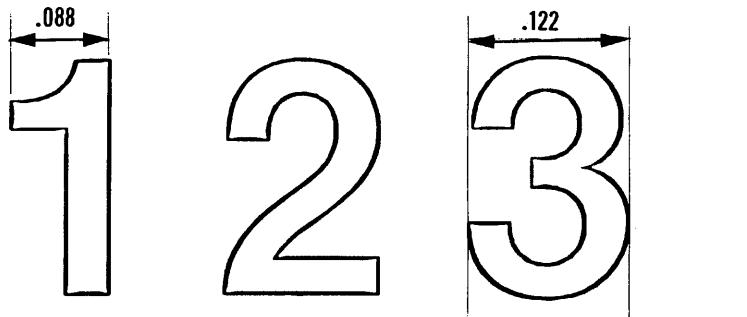
ALL CHARACTERS IN HELVETICA BOLD APPROXIMATE PRINTING		
SIZE OF SYMBOL	POINT SIZE NUMBERS	POINT SIZE LETTERS
1/2"	13	9
3/4"	20	13
1"	26	17

SECTION A-A

REFERENCE DRAWING FOR CONSTRUCTION OF ENGRAVING MASTER (SCALE 8 × 1/2" SYMBOL)

9.0 ENGRAVING MASTERS

9.2 Numbers & Letters



REFERENCE DRAWING FOR CONSTRUCTION OF ENGRAVING MASTER (SCALE 8 X 1/2" SYMBOL)