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**July 23, 2012**

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

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

**Dear Secretary Clarke:**

**I am writing to request an extension in the date for filing public comments on impacts and possible modifications for the FTC Guides for the Jewelry, Precious Metals and Pewter Industries, currently set for August 27, 2012. The JVC, along with its partner trade associations who will jointly file comments on behalf of the entire jewelry industry, seeks an adjournment to reply no later than September 28, 2012. This request is the result of careful consideration, but is necessary due to circumstances beyond our control as described below.**

**This review of the FTC Guides is a fundamentally important opportunity for the industry, which has been anticipated for some time. The industry as a whole is very focused on the importance of this project, and has already devoted substantial resources.**

**It has been 20 years since the Guides have been subject to a general review. Thus, this opportunity to look carefully at the current Guides and consider any adjustments needed to adapt to the many changes in the industry is of vital importance. Further, it is likely that any revisions made will be impactful for many years to come. Thus, it is important that our comments be carefully researched, accurate and fully substantiated in order to provide useful information and inputs to the FTC.**

**The trade associations seeking to file joint comments have been working diligently to understand the questions asked by the FTC and to answer in a manner that provides sufficient technical information and market research to substantiate our positions. Since January 2012, JVC has several working groups involving dozens of industry members developing positions and gathering technical information and evidence. Since the date of the publication by the FTC of its Request for Comments, these working groups have been meeting more frequently, and developing further research topics and positions, which require further exploration.**

**Our intention is, where appropriate, to substantiate our comments with market research on consumer perceptions. We are working with two**

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separate market research companies to conduct the research, compile and analyze the data, and submit it to the FTC in appropriate and useful form. These market research companies are informing us that they will be very rushed in order to complete their tasks responsibly to meet the current deadline. It is important that once we have the data, we have time to organize and analyze it for presentation to the FTC. Thus, in order to ensure this information is of best use to the FTC, we will need more time. This reason for seeking an extension is especially important to us.

The FTC publication requesting comments contains 24 separate questions (many with sub-questions) on which it seeks comments. These questions cover a wide array of topics in pearls, diamonds, color gems, and precious metal. The research on these topics is complicated, and in addition to requiring careful design of the market research, also requires technical submissions by industry experts in the metallurgical and gemological sciences providing technically accurate and complete responses to the questions on the nature of precious metal, the nature of treatments to gems, etc. These are also in development. However, given the time of year (summer vacations,) it has become a serious challenge to gather this supporting information in a timely manner that allows full consideration of each technical question carefully.

Therefore, we are compelled to seek this one-month extension of the time to file comments. Please be assured that we will work steadily throughout the period, and if we are able to file our comments earlier than that date, we will do so.

Thank you for your consideration of this request. If you have any questions, please do not hesitate to contact me.

Very truly yours,



**Cecilia L. Gardner, Esq.**  
**President and CEO, General Counsel**  
**Jewelers Vigilance Committee**

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

**Jeffrey Fischer, Chairman of the Board of Directors**  
**Jewelers Vigilance Committee**