

RICHLINE GROUP

A Berkshire Hathaway Company

March 31, 2017

The Honorable Wilbur L. Ross, Jr.

Secretary of the United States Department of Commerce

Dear Mr. Secretary:

Thank you for the opportunity to comment on a Department of Commerce regulation that is driving manufacturing and jobs out of the United States. The attached paper details the problem and suggests a solution for your consideration:

Richline is the United States' foremost jewelry manufacturer, selling to thousands of retailers and jewelry outlets in the US and throughout the world. We have been a wholly-owned subsidiary of Berkshire Hathaway Inc. since 2007. From alloy production to the creation of internationally recognized consumer jewelry brands, Richline is a worldwide presence in the global jewelry supply chain, with America being our largest market. Unlike many manufacturers that have moved their production to Asia, we are committed to our United States presence.

Given the choice, Americans prefer to buy American. But outdated, restrictive regulations have put us at a disadvantage to foreign competitors in our own market. In particular, the Federal Trade Commission's standard for labeling products "Made in USA" is causing American manufacturers like Richline to export and pay transportation costs and foreign tariffs rather than sell them in the United States.

Being a jewelry manufacturer, Richline is concerned primarily with the needs of jewelers and the precious metals industry—jewelry, refining, electronics, catalytic compounds, mill products, chemicals, pharmaceuticals, dental alloys, etc. But all manufacturers that use recycled raw materials are affected—steel and paper mills, aluminum smelters, chemical companies and innumerable other businesses. All are handicapped by the same outdated Federal Trade Commission standard that needlessly keeps them from labeling their products: "Made in USA."

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We have tried repeatedly to make our case to the FTC but have been rebuffed each time. We hope that this new administration will consider our request with an open mind. We need laws and regulations on a par with those of other countries so we will be free to compete.

The attached paper is a specific way to rationalize restrictive regulations and help reinvigorate the jewelry and precious metals raw materials businesses.

Respectfully,

Mark Hanna

Chief Marketing Officer

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