July 2, 2009

VIA ELECTRONIC MAIL

Office of the Secretary
U.S. Consumer Product Safety Commission
4330 East-West Highway, Room 502
Bethesda, MD 20814-4408

Re: Request for Reconsideration of Emergency Stay of Enforcement (CPSIA §103)

Dear Commissioners:

On behalf of the Promotional Products Association International (PPAI), I would wish to express our support of, and join the petition filed by the National Association of Manufacturers, dated July 1, 2009, requesting an emergency stay of enforcement of Section 103 of the Consumer Product Safety Improvement Act (CPSIA) which requires a new tracking label for children’s products made on or after August 14, 2009.

PPAI—the promotional products industry’s only international not-for-profit trade association—offers education, tradeshows, business products and services, mentoring, technology and legislative support to its more than 7,500 global members. Promotional products are more than a $19.4 billion industry and include wearables, writing instruments, calendars, drinkware and many other items, usually imprinted with a company’s name, logo or message. PPAI created and maintains the UPIC (Universal Promotional Identification Code), the industry’s only free identification system and universal company database.

The industry consists of approximately 25,000 distributors and 3,500 suppliers. The distributor develops solutions to marketing challenges through the innovative use of promotional products and is a resource to corporate buyers, marketing professionals and others. A supplier manufactures, imports, converts, imprints or otherwise produces or processes promotional products offered for sale through distributors and the distributors’ sales force known as promotional consultants.

On April 25, 2009, we filed our own comments regarding tracking labels. In those comments we outlined the many challenges facing the promotional products industry as it attempts to comply with the tracking label requirements. Nothing has changed. Those challenges remain and our industry desperately needs comprehensive guidance from the CPSC on the many issues we raised in those comments.

We have worked very hard to educate our members about the law and its potential application to our industry. I encourage you to visit our web page dedicated to this endeavor at www.ppa.org/productsafety. We are quite proud of our efforts.
Sincerely,

G. Stephen Slagle, CAE
President/CEO