



June 5, 2009

U.S. Customs and Border Protection  
Office of International Trade  
Regulations and Rulings  
Mint Annex  
799 9th Street N.W.  
Washington D.C. 20229

Attn: Intellectual Property and Restricted Merchandise Branch

**RE: Request To Extend Comment Period. PROPOSED REVOCATION OF RULING LETTERS AND REVOCATION OF TREATMENT RELATING TO THE ADMISSIBILITY [sic] OF CERTAIN KNIVES WITH SPRING-ASSISTED OPENING MECHANISMS**

Knife Rights, Inc., representing an estimated 40 million folding knife owners in the United States, requests that the comment period for the Customs and Border Protection (CBP) Proposed Revocation of Ruling Letters and Revocation of Treatment Relating to the Admissibility [sic] of Certain Knives with Spring-Assisted Opening Mechanisms (Proposal) be extended from its current 30-day period (closing June 21, 2009) to 120 days (closing September 18, 2009).

Knife Rights and individual folding pocket knife owners lack the financial and legal resources and other expertise immediately available to respond appropriately in the initial short comment period. We estimate that it will take at least 45-60 days for our volunteer legal experts and advisors to develop an adequate understanding of the contents of this proposal, the sophisticated legal issues and potential economic issues and write full and unbiased explanations of the potential ramifications, provide answers and counter arguments where applicable to the rationales presented by CBP in support of their Proposal and present facts and draft articles for publication and a full and complete response that is likely to number many tens, if not hundreds of pages. Until this information is available for knife owners to review, they cannot adequately assess the true impact of this complicated ruling, so they cannot therefore adequately comprehend and understand this Proposal in order that they may provide a fully informed response to CBP.

The Proposal encompasses 63 pages of highly technical arguments and exhibits which must be comprehensively examined and researched. Even a cursory review of the Proposal reveals that this represents a major reversal and change in policy with potentially far-reaching ramifications to the knife community, both industry and individual owners. It is clear that the effects of this ruling and its broad new interpretation of gravity and inertia opening knives would potentially reach far beyond the title's limited concern for knives with spring-assisted opening mechanisms and could affect a significant majority of folding pocket knives currently imported and sold in the U.S. and carried by law-abiding Americans.

This modest 120-day extension requested is essential to ensure that America's folding pocket knife owners, who will be significantly impacted by this Proposal, have adequate opportunity to comment. The uniquely diverse nature of the folding pocket knife owning community and the logistical challenges of notifying and educating these knife owners on this complicated issue are challenges that require more time.

From our initial examination of the Proposal, we are unable to discern any imperative to require the unduly short 30-day comment period. This Proposal does not involve national security; the issues involved do not threaten the nation's defense or health. There is no evidence the current interpretation harms the nation or its citizens in any significant manner, or that delaying any implementation would cause undue harm to the nation or citizens. On the contrary, our initial review suggests that the far-reaching changes proposed could have significant unanticipated adverse effects on the nation and its law-abiding citizens that have not been contemplated, nor adequately considered, by the authors of the Proposal. The harm that would be done to the 6.5 Billion dollar (total economic impact) knife industry, which employs directly and indirectly approximately 28,000 Americans, would be irreparable and could permanently eliminate thousands of jobs at great economic cost to the nation and these citizens. A full and carefully considered review of the potential serious adverse economic consequences for the country and its citizens requires more time.

Many, if not most knife owners and enthusiasts who would be impacted adversely by this Proposal still are dependent upon printed media for their knife industry and community news. We have confirmed that all the major knife and related media publications have similar 60-day minimum lead times for publication, once the initial research and response is formulated per our 45-60 day estimate above. Once these knife owners have received their printed publications, they will reasonably require at least another 30 days in order to digest the information and then prepare and communicate their comments to CBP. CBP's confirmed unwillingness to accept email comments further exacerbates the problem with the delays inherent in postal communications. As such, the request for a modest 120-day extension is necessary and reasonable.

Knife Rights asks that CBP consider this request for an extension in a timely manner.

Knife Rights further requests the CBP provide an email address for citizens to provide comments in order to encourage concerned citizen participation in this process and allow CBP the fullest input from folding pocket knife owners and others impacted by the Proposal.

Respectfully Submitted,

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