



February 13, 2009

Mr. John "Gib" Mullan
Assistant Executive Director
Office of Compliance and Field Operations

Ms. Cheryl A. Falvey
General Counsel

United States Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

Dear Ms. Falvey and Mr. Mullan:

On behalf of the Promotional Products Association International (PPAI), I would wish to express our support of, and join the petition filed by the Writing Instrument Manufacturers Association (WIMA), dated February 9, 2009, requesting that pen point components be excluded from compliance with Section 101 of the Consumer Product Safety Improvement Act (CPSIA). Writing instruments are among our most common promotional products, representing 10 percent (\$1.9 billion) of our sales.

PPAI—the promotional products industry's only international not-for-profit trade association—offers education, tradeshow, 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.

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.ppai.org/productsafety. We are quite proud of our efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Slagle", written in a cursive style.

G. Stephen Slagle, CAE
President/CEO