

August 11, 2006

**PUBLIC COMMENT ON S 3236 IS**  
**To suspend temporarily the duty on certain golf bag bodies.**

With regard to Senate Bill 3236 IS, we are in favor of suspending the duty charged on golf bag bodies by changing their HTS number to 9902.63.07, on either a temporary or permanent basis. We believe the effect of such a suspension of duty would allow the retention of jobs inside the United States.

Suspending the duty rate of 7% would result in a lower cost structure to those producers still assembling golf bags inside the United States. This, in turn, provides such producers the opportunity to remain competitive while using a current business model that incorporates domestic assembly of golf bags, rather than importing finished golf bags that have been assembled abroad using lower cost labor.

Other issues facing a domestic assembler of golf bags include the rising costs of commodities such as aluminum, nylon etc., the rising transportation costs that are being driven by higher fuel prices, and the pressure our Government is placing on China to “un-peg” its currency in relation to the U.S. dollar (which has already begun to occur). These all have the effect of pushing costs higher and ultimately force the producer to consider an alternative business model that utilizes lower cost foreign labor. The suspension of the duty on these product categories would provide the necessary cost relief to maintain the business model under discussion.

It would seem to us, that the golf bag body product category is not large enough to have a material adverse effect on the overall revenue of the U.S. Government, but it would provide a significant boost to producers who assemble golf bags inside the United States, and afford them a degree of economic strength that would result in the prolonged effectiveness of the business model herein described.

As one of the major producers on this type of product within the United States, we do not feel a suspension of duty on the golf bag body using above referenced HTS category would adversely affect other U.S. companies who have already abandoned U.S. labor in favor of lower cost foreign labor, due to the fact that they would already be enjoying the benefits of their business decision.

Thank you for the opportunity to provide public comment on this issue.

Sincerely  
Blake W Ludwig CPA  
Controller/CFO  
Sun Mountain Sports, Inc.