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To: United States Fish and Wildlife Service

September 13, 2015

SEP 18 2015

From: CRAFTS of NJ

Div. of Policy, Perf. &

Subject: Section 4(d) Rule for the African Elephant
MGMT Programs

CRAFTS of NJ was organized in 1980 to encourage interest in early trades and industries and to foster the identification, study, and preservation of early tools and implements. We are a Federal 501(c)7 organization and a New Jersey non-profit corporation. In support of our mission we hold education meetings, publish a quarterly journal, the Tool Shed, and support young craftsmen. We have grown to 460 members living in 34 states.

We, the Directors of CRAFTS, have concerns with the Revision of the Section 4(d) Rule for the African elephant. Our primary concern is that the Rule would preclude the interstate sale of existing ivory measurement instruments, hereinafter called "rules," manufactured in the United States and less than 100 years old. Ivory rules are an important collectible tools for our members and other collectors across the country.

. The great majority of ivory rules manufactured in the United States would qualify as antiques more than 100 years old, but not the ones manufactured between 1916 and 1930. Ivory rules were made after 1915 by such companies as Stanley Rule & Level, Upson Nut, and Chapin-Stephens. However, Stanley's last ivory rule was manufactured in 1922, Upson Nut made no rules after 1922, and Chapin-Stephens went out of business in 1928. Eight other significant American manufacturers of ivory rules were all out of business before 1915. There were other small makers of ivory rules, primarily in the mid-to-late 1800s, but sales of these rules would be allowed as antiques. We do not have statistics on the number of ivory rules ever produced or the number that survive today.

To illustrate our subject there is attached a page from Stanley's 1909 Catalog that shows a variety of ivory rules and an equal number of boxwood rules. The ivory rules stand out as being white. In that year Stanley offered 73 boxwood rules and 16 ivory rules. This ratio understates the proportion of ivory rules to boxwood rules sold, as Ivory rules were almost four times more expensive and were likely out of reach for the average carpenter.

A further concern with ivory rules is that while manufacturer's catalogs and our own research can prove that some ivory rules are antiques, this is not possible for all ivory rules. For example, if a specific ivory rule were manufactured without change in details or markings between 1900 and 1920, there would be no way to prove it was manufactured before 1915 and therefore be antique or after 1915 and not be antique.

The change we seek is in the proposed Rule's distinction between items made wholly of ivory and items where ivory is a fixed component of a larger item. There may be some reason for this distinction, but that is not explained, and we can think of no reason why you would want to make the distinction. Some uncertainty with the distinction must exist as you have asked for input. We do not see any reason why it should matter if less than 200 grams of ivory were or were not attached to some other material?

Most ivory rules weigh less than 200 grams. The heaviest rule in one major collection weighs 157 grams. A few specialized ivory rules may weigh more than 200 grams and we seek no relief for them. So, if the distinction between items made wholly of ivory and items where ivory is a fixed component of a larger item were eliminated, then interstate sales of ivory rules under 200 grams would be unaffected. You say that you do not want to unnecessarily restrict activities that have no effect on the conservation or protection of the African elephant, but you are doing that to ivory rule collectors.

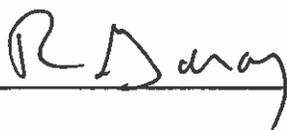
It's possible that the existence of early manufactured ivory rules is something you were not aware of or did not consider in drafting the Rule revision. That is not surprising. But, now that you are aware of what we have presented to you about ivory rules, especially the early dates that manufacture was terminated, we ask that you give consideration to the following recommendation.

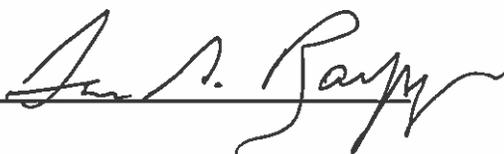
We, the Officers and Directors of CRAFTS, are strongly recommending that the proposed Rule provision applicable to items containing less than 200 grams of ivory be modified to remove the distinction between items made wholly of ivory or partially of ivory. The proposed Rule, if not amended, will have a devastating effect on individuals who have collected, researched and written about these beautiful ivory rules and their history.

We are as concerned about the African elephant as is the Service, and are supportive of your effort; however, the Rule revision unfairly penalizes collectors of ivory rules with no effect on conservation or protection of the African elephant.

Should you have any question or seek additional information, please contact CRAFTS president, Robert Garay, at 15 North River Styx Road, Hopatcong, NJ 07843 or by email at takeadip@optonline.net

Signed by the following Directors of CRAFTS of NJ.





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B

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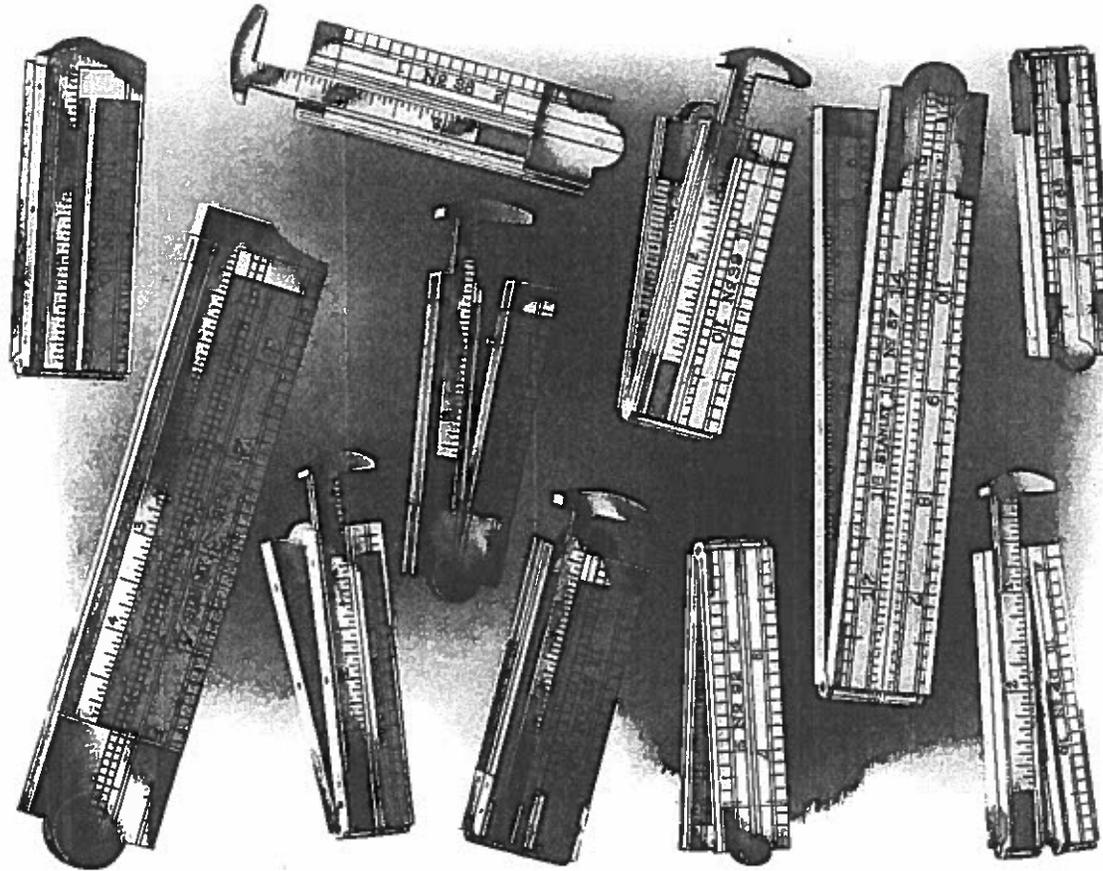
John C. Fluby

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Stanley Boxwood Caliper and Ivory Rules

CRAFTS of NJ

STANLEY RULE AND LEVEL COMPANY



CARPENTERS AND MECHANICS TOOLS

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