

COPY

April 19, 1949.

HON. CHARLES F. BRANNAN
Secretary, Department of Agriculture
Washington 25, D.C.

Dear Mr. Secretary:-

May I call your attention to Report No. D1734, titled: "A Standard of Quality for House Paint" - United States Department of Agriculture, Forest Service, Forest Products Laboratory, Madison, Wisconsin - January 1949. The first sentence of this report, prepared for popular consumption, is: "You can now buy house paint and barn paints labeled by the maker with both his trade name and a classification recommended by the U. S. Department of Agriculture." (Underlining supplied.)

The report also proposes to emphasize and publicize these recommendations by paint labels which "must" state among other things "classified according to the recommendations of the United States Department of Agriculture, Technical Bulletin No. 804." This bulletin is titled "Classification of House and Barn Paints as Recommended by the United States Department of Agriculture," - United States Department of Agriculture, Washington, D.C. - January, 1942.

These publications were prepared and issued without prior notice to this industry. I understand Government Departments and Agencies do not usually make such far-reaching recommendations without consultation with the industries affected. Had we or the Federation of Paint and Varnish Production Clubs (composed of paint chemists and technicians) been given the opportunity, I am sure that facts would have been presented to prove that such classification recommendation, made in Technical Bulletin No. 804 by the same author, was not only undesirable but technically inaccurate.

It is stated in the last paragraph of Report No. D1734 that Technical Bulletin No. 804 was prepared for paint chemists. However, it represents the views of one individual, the author, and it has not been and is not acceptable to paint chemists generally or to this industry.

While we are opposed to any attempt at classification or grading of paint for reasons stated in the attached memorandum, the system presented in Technical Bulletin No. 804 and described in Report No. D1734 is not only complex but confusing and positively misleading to consumers. Therefore, the apparently unqualified endorsement by the Department of Agriculture

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of the views of one individual employee is particularly unfortunate. I need only state that paints which would be labeled Grade 3 in accordance with requirements of the system recommended by the Department of Agriculture may be superior in quality to those which can under the same system be labeled Grade 1. This, I understand, is admitted by the author. Furthermore, I am sure there is no need to expand upon the damage that could result to long established and reputable manufacturers of high quality paints from the competition of paints which could be labeled Grade 1 as recommended by the Department and yet not be as good quality as other paints which would have to be labeled Grade 3 under the system.

We already have some evidence of the calculated effect of these two publications of the Department in the following recent advertisement directed by one manufacturer to dealers: "It's easy to sell paint classified by the U. S. Department of Agriculture. You have easier, more profitable selling when you stock, feature and display x x x." His label also prominently features "Grade 1 -- classified according to recommendations of the U. S. Department of Agriculture." We believe the paint is of good quality but no better than other paints which do not carry the implied endorsement of your Department.

Therefore, we respectfully request and urge that both these publications be withdrawn from circulation and further sponsorship of your Department.

I greatly appreciate your courtesy in permitting me to present this matter to you and hope that you will call on me for further information if needed in connection with this request.

With warm personal regards.

Sincerely yours,

/s/

JOSEPH F. BATTLE

President

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