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July 10, 2005

Deborah A. Garza, Chair
Jonathan R. Yarowsky, Vice Chair
Antitrust Modernization Commission
1120 G Street, NW
Suite 810
Washington, DC 20005

Dear Ms. Garza and Mr. Yarowsky:

On behalf of the Wood Machinery Manufacturers of America (WMMA), I am writing in response to the Federal Register notice of May 19, 2005 requesting comments on issues being studied by the Commission. In particular, the WMMA would like to voice its support for the Export Trading Company Act and Webb-Pomerene Acts and strongly urge that the Commission not recommend the elimination or limitation of these laws to the President and Congress.

The WMMA is a trade association representing the commercial interests of its 220 members. The membership is made up of USA manufacturers of woodworking equipment, cutting tools and accessories. Together, the membership accounts for over 75% of USA output of woodworking machinery. Total US output approximates \$1 billion making the US woodworking industry one of the worlds largest. In 2003 US exports of woodworking and related equipment was about \$270 million. To learn more about the WMMA, please visit our website, www.wmma.org.

The WMMA is the holder of an ETC certificate for our membership and has been a certificate holder since 1989. Foreign competition in this industry is extremely competitive. Most of our members are very small companies and alone, find it extremely difficult to market their products internationally. Under protection of an ETC members can jointly undertake market research, consolidate administrative costs and implement marketing campaigns. At a time when U.S. trade deficits are routinely setting record highs, it would be unthinkable for the Antitrust Modernization Commission to come to the conclusion that these laws merit repeal.

Although the joint export trade provisions (with huge benefits and zero costs) can easily satisfy whatever standards the AMC may choose to apply in its review, we strongly reject the notion that supporters should have to bear the burden of proving that the benefits of an existing law exceed its costs. It should go without saying that the burden rests with anyone attempting to alter an established law of Congress. In this same vein, the joint export trade provisions should not be subject to a "sunset" provision. If these laws continually were up for renewal at regular intervals, the legal certainty and protections they afford would be cast into doubt, and it would impinge on the long-term planning and contracting in which joint exporters engage.

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Any attempts to change U.S. antitrust law should, at a minimum, do no harm to the U.S. economy. There can be no doubt that the repeal of the ETC and Webb-Pomerene Acts would harm the U.S. economy, including WMMA member exporters.

Thank you for your consideration of these comments.

Sincerely

A handwritten signature in cursive script that reads "Harold Zassenhaus".

Harold Zassenhaus
Export Director