

August 12, 2015

Daniel M. Ashe
Director
U.S. Fish and Wildlife Service
1849 C St NW
Washington, DC 20240

RE: Comment Period for “Endangered and Threatened Wildlife and Plants; Revision of the Section 4(d) Rule for the African Elephant (*Loxodonta africana*).”

Dear Director Ashe:

On behalf of Knife Rights and the millions of knife owners we represent, I am writing today to respectfully request that the deadline be extended an additional 30 days for public comments on the U.S. Fish and Wildlife Service’s (FWS) proposed rule titled, “Endangered and Threatened Wildlife and Plants; Revision of the Section 4(d) Rule for the African Elephant (*Loxodonta africana*).”

The proposed rule would severely restrict the import, export and interstate sale of legally-owned African elephant ivory, causing significant harm to American knife owners, knifemakers, scrimshaw artists and suppliers to knifemakers and scrimshaw artists, as well as anyone else that currently owns ivory. Ivory has been used in knives for centuries, just as it has been used in fine furniture, jewelry, firearms, sculptures, toys, musical instruments, watches, canes, billiards equipment, and a myriad of other objects. It remains a popular and legal knifemaking material today. Given the breadth of the impact this proposed rule would have on law-abiding ivory owners across the U.S., including small businesses, we believe the 60 days allotted by the FWS is not sufficient for affected parties and the general public to provide meaningful comments and suggestions.

An extension of an additional 30 days would allow all of those impacted to fully analyze the proposed rule and to provide you with worthwhile information and feedback prior to finalizing the regulation.

Thank you very much in advance for your consideration of this request, and I look forward to your response.

Sincerely,



Douglas S. Ritter
Chairman