

BRUNSWICK CORPORATION • 1 N. FIELD COURT • LAKE FOREST, ILLINOIS 60045-4811, U.S.A. • 847/735-4430  
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MARSHALL SMITH  
VICE PRESIDENT AND GENERAL COUNSEL

September 27, 2002

Defense Acquisition Regulations  
Attn: Ms. Amy Williams  
OUSD (AT&L) DP (DAR), IMD 3C132  
3062 Defense Pentagon  
Washington, D.C. 20301-3062

Re: DFARS Case 2002-D008:

Dear Ms. Williams:

I am writing on behalf of Brunswick Corporation to support the change proposed in the subject Case. Brunswick Corporation is a major U.S. manufacturer and exporter of recreational and marine equipment. For over a century, Brunswick has led the way in bowling and billiards, an \$8.4 billion global market; we also manufacture pleasure and fishing boats and marine engines, and export them to markets worldwide. In the industries where we compete, Brunswick Corporation sets the pace in using innovative technology in new and improved products. We continuously incorporate advanced manufacturing technology in our manufacturing operations in 13 U.S. states and seven foreign countries. We employ over 15,000 workers in our U.S. operations.

As a global company competing in a global market, Brunswick relies on its own network of manufacturing operations and sources for inputs. The existing regulatory treatment of U.S.-manufacturing end products under the Buy American Act and the Trade Agreements Act is confusing, and creates uncertainty that handicaps our operations. The existing DoD treatment also provides an incentive for a manufacturer to finally manufacture its product in a "designated" country outside the United States, and not in the United States itself, if the cost of that product's foreign components exceeds 50% of the total cost of the product. This result cannot have been intended.

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**Brunswick supports the change proposed in Case 2002-D008. This change would simplify the procurement process, reduce burdens on manufacturers of U.S. end products, and eliminate the existing incentive to move final manufacturing offshore.**

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Brunswick would be pleased to discuss this issue with you further at your convenience.

Sincerely,



Marshall Smith