

ACUSHNET COMPANY

August 14, 2023

Mr. John Spitzer
Managing Director, Equipment Standards
United States Golf Association
77 Liberty Corner Road
Liberty Corner, NJ 07938

Dr. Steve Otto
Executive Director – Chief Technology Officer
The Royal and Ancient Golf Club of St. Andrews
St. Andrews
KY16 9JD, United Kingdom

Re: Response to March 14, 2023 Notice and Comment

Dear John and Steve,

This letter and its attachment contain Acushnet Company's response to the Notice to Manufacturers, issued by the USGA and R&A on March 14, 2023, which proposes a Model Local Rule (MLR) regarding reduced distance golf balls for use in elite competitions and the use of different golf balls for all other play. In connection with the Distance Insights Project, it has been suggested that driving distance, golf course sustainability and the level of skills required to achieve competitive success are reasons to take action to curtail distance at the elite level. Our response provides data and important insights into these topics.

Acushnet firmly believes that the sport of golf is healthy and well-positioned for the future, the many skills required for success at the elite level are in balance and there is no evidence that driving distance has harmed or is likely to harm the game.

We also believe that unification of the Rules of Golf, including equipment standards, is a critical contributor to golf's aspirational appeal and enduring, generational success, and that, if implemented, the proposed MLR would cause unnecessary disruption and confusion that would be detrimental to the sport.

Unification is a Key Contributor to Golf's Successful Past.....and Promising Future

One of golf's unique appeals is that everyone plays by the same set of rules and can play the same courses with the same equipment. Golfers can watch professionals and compare themselves to the world's best, aspiring to hit the same shots. This unification links the professional and recreational games, is enriched by PGA Professionals, strengthens the attachment to the professional game, and contributes to golf's momentum and promising future. Unification has long been extolled by stakeholders as a foundational contributor to the game's success, and over time the Governing Bodies have been consistent advocates of a unified sport:

The R&A and USGA continue to believe that the retention of a single set of rules for all players of the game, irrespective of ability, is one of golf's greatest strengths. The R&A and USGA regard the prospect of having permanent separate rules for elite competition as undesirable and have no current plans to create separate equipment rules for highly skilled players.¹

¹ USGA and R&A Joint Statement of Principles, May 2002

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We are concerned that implementation of the proposed MLR would divide golf between elite and recreational play, and add confusion, complexity, and unnecessary costs. In addition, equipment bifurcation would break the linkage that helps to make golf special and enduring.

The Sport Is in Balance - Distance Trends on the PGA TOUR Have Plateaued and Many Skills Are Required to Achieve Success at the Elite Level

- Average PGA TOUR driving distance has increased modestly from 285.9 yards in 2003 to 299.8 yards in 2022.
- Average PGA TOUR clubhead speed has increased only 2.3 mph since 2008, and average clubhead speeds of the fastest 1%, 5%, 10%, 20% and 50% of measured clubhead speeds have been flat for several years.²
- Average driving distances for the PGA TOUR driving distance leaders in 2003 and 2022 were identical at 321.4 yards.
- Success at the professional / elite level requires a wide range of skills. Clubhead speed, while valuable, is but one of many necessary skills – and non-drive shots contribute the most to scoring advantage.
- PGA TOUR scoring average is unchanged from 2003 to 2022.³

The most significant factors contributing to driving distance increases in the past two decades, such as launch monitor fitting and optimization, firm and fast golf course conditioning, and player fitness and training, have reached their realistic limits. In addition, existing regulations for golf equipment, including golf balls, have been effective in controlling driving distance gains.

Golf Courses and Yardage Trends are Stable

- Average PGA TOUR course playing length was 7,120 yards in 2004 and 7,179 in 2022.⁴ In most cases, PGA TOUR events are played at less than the applicable stated scorecard lengths.
- New 18-hole U.S. regulation golf courses built between 2010-2020 averaged 6,652 yards - 274 yards shorter, on average, than those built between 1990-2000.
- The average length from the back tees of existing U.S. golf courses is 6,705 yards and the average maintained turfgrass area for 18-hole golf courses decreased 3% from 2005-2021.⁵

We are enthused by the state of golf today, its broadening participation and promising outlook for the future. We believe that implementation of the proposed MLR will diminish the game's momentum and negatively impact its appeal for future generations.

² According to the USGA and R&A 2022 Distance Report

³ 71.3 in 2003, 71.1 in 2022

⁴ According to the PGA TOUR

⁵ Course length and turfgrass areas according to the NGF and GCSAA. These resources further point out that the greatest increase in maintained areas has been for practice facilities.

Thank you for your attention. We value our long-standing partnerships with the USGA and R&A and look forward to your feedback and continued dialogue on these important topics, as we and other stakeholders seek to position the sport for long term, sustaining health and success.

Respectfully,

A handwritten signature in black ink, appearing to read "D. Maher". The signature is fluid and cursive, with a large initial "D" and a long horizontal stroke at the end.

David Maher
President and Chief Executive Officer
Acushnet Company

Cc: Mr. Michael Whan
Mr. Martin Slumbers

ACUSHNET COMPANY

ACUSHNET RESPONSE TO USGA AND R&A NOTICE & COMMENT PROPOSING GOLF BALL BIFURCATION

“The R&A and USGA continue to believe that the retention of a single set of rules for all players of the game, irrespective of ability, is one of golf’s greatest strengths. The R&A and USGA regard the prospect of having permanent separate rules for elite competition as undesirable and have no current plans to create separate equipment rules for highly skilled players.”
USGA and R&A Joint Statement of Principles, May 2002

Fairhaven, MA (March 14, 2023) - The sport of golf has advanced and evolved over the years thanks to a thoughtful balance between innovation and tradition. One of golf’s unifying appeals is that everyone in the game plays by the same set of rules, can play the same courses and with the same equipment. Golfers can watch professionals and compare themselves to the world’s best, aspiring to hit the same shots. This unification links the professional and recreational games, enriches the connection and viewing experience of the professional game, and contributes to golf’s momentum, unprecedented growth and promising future.

The USGA and R&A have announced a Notice and Comment to manufacturers proposing a potential rule change to golf ball testing that results in a Model Local Rule (MLR) that provides for reduced distance golf balls intended for professional and elite amateur competitions and a different set of rules for all other play. This bifurcation would divide golf between elite and recreational play, add confusion, and break the linkage that is part of the game’s enduring fabric.

“Golf is an aspirational sport, and we believe at its very best when equipment and playing regulations are unified. Golf’s health and vibrancy are at historically high levels,” said David Maher, President and Chief Executive Officer, Acushnet Company. “As we see it, existing golf ball regulations for Overall Distance and Initial Velocity are highly effective. During the past two decades, PGA TOUR average course playing length has increased by less than 100 yards and scoring average has remained virtually flat. Average PGA TOUR clubhead speed of 114.6 mph in 2022 was well below the current 120 mph and proposed 127 mph testing conditions. The proposal of golf ball bifurcation is in many respects a solution in search of a problem.”

Under the proposed guidelines, events that adopt this MLR would require players to use a substantially shorter golf ball, similar in distance to what was available in the 1990’s. The performance changes of any rolled back ball would impact every shot in the round. Players would also be required to adapt to changes in equipment with some players disadvantaged over others by this disruption. Golf ball bifurcation would invite confusion as to what level of competition would use the MLR products and how to effectively manage and officiate. In addition, multiple versions of golf ball models in the market would be confusing to golfers.

“Playing by a unified set of rules is an essential part of the game’s allure, contributes to its global understanding and appeal, and eliminates the inconsistency and instability that would come from multiple sets of equipment standards,” continued Maher. “Unification is a powerfully positive force in the game, and we believe that equipment bifurcation would be detrimental to golf’s long-term well-being. As a result, we will actively participate in this conversation with the governing bodies, worldwide professional tours, PGA Professional organizations, amateur associations and federations, and golfers, in an effort to contribute to the continued enjoyment and growth of the game.”

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A photograph of a golf course green with a sand trap in the foreground. The green is well-maintained and has a flag on it. The sand trap is surrounded by tall, golden-brown grasses. The background shows more of the golf course and some trees.

***ACUSHNET RESPONSE TO
MARCH 14, 2023 USGA AND R&A
NOTICE TO MANUFACTURERS***
August 2023

ACUSHNET PERSPECTIVE

- Golf is healthy and well-positioned for the future
- Unification is in the best interest of the sport
- Existing golf ball regulation is highly effective
- Elite driving distance has plateaued
- Skill and shot value are critical and consistent with years past
- Data does not indicate a need for courses to expand





GOLF IS HEALTHY, VIBRANT AND WELL-POSITIONED FOR THE FUTURE

- Rounds of play at record levels
- Global surge in participation and interest
- Juniors and women are the fastest growing segments
- Professional golf is aspirational and exciting to watch
- Infusion of talent in the competitive amateur game

“Golf is enjoying a real boom in popularity at the moment... We need to work together as a sport to make the most of this opportunity.”

- Phil Anderton, Chief Development Officer R&A



GOLF IS AT ITS BEST WITH UNIFICATION

Unification is part of the game's enduring appeal

Everyone plays by the same set of rules

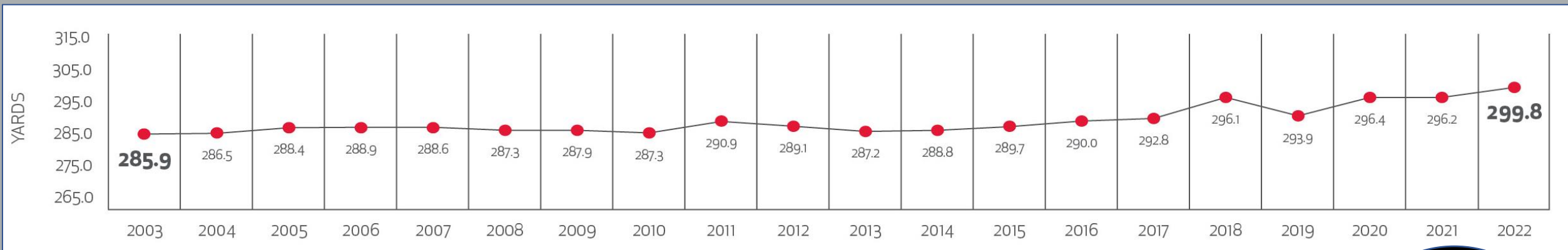
Everyone can play the same courses with the same equipment

Amateurs can compare themselves to the world's best, admire their skills and aspire to hit the same shots

"The R&A and USGA continue to believe that the retention of a single set of rules for all players of the game, irrespective of ability, is one of golf's greatest strengths. The R&A and USGA regard the prospect of having permanent separate rules for elite competition as undesirable and have no current plans to create separate equipment rules for highly skilled players."

- USGA and R&A Joint Statement of Principles, May 2002

PGA TOUR AVERAGE DRIVING DISTANCE INCREASES HAVE BEEN MODEST



Source: PGA TOUR

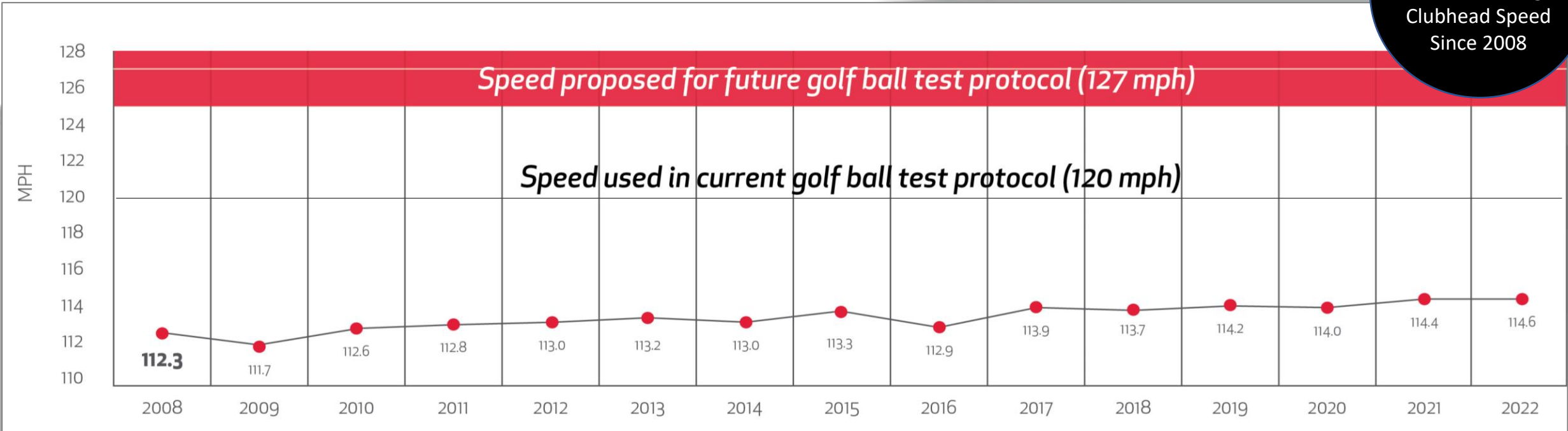
+0.7 yds
Average Distance
increase per year
since 2003

- Distance has only increased an average of 0.7 yards per year since 2003 due to several contributing variables:
 - Golf-specific fitness and training regimens
 - Optimized elite instruction and equipment fitting through launch monitor technology
 - Golf course conditioning and agronomy
 - Equipment innovation

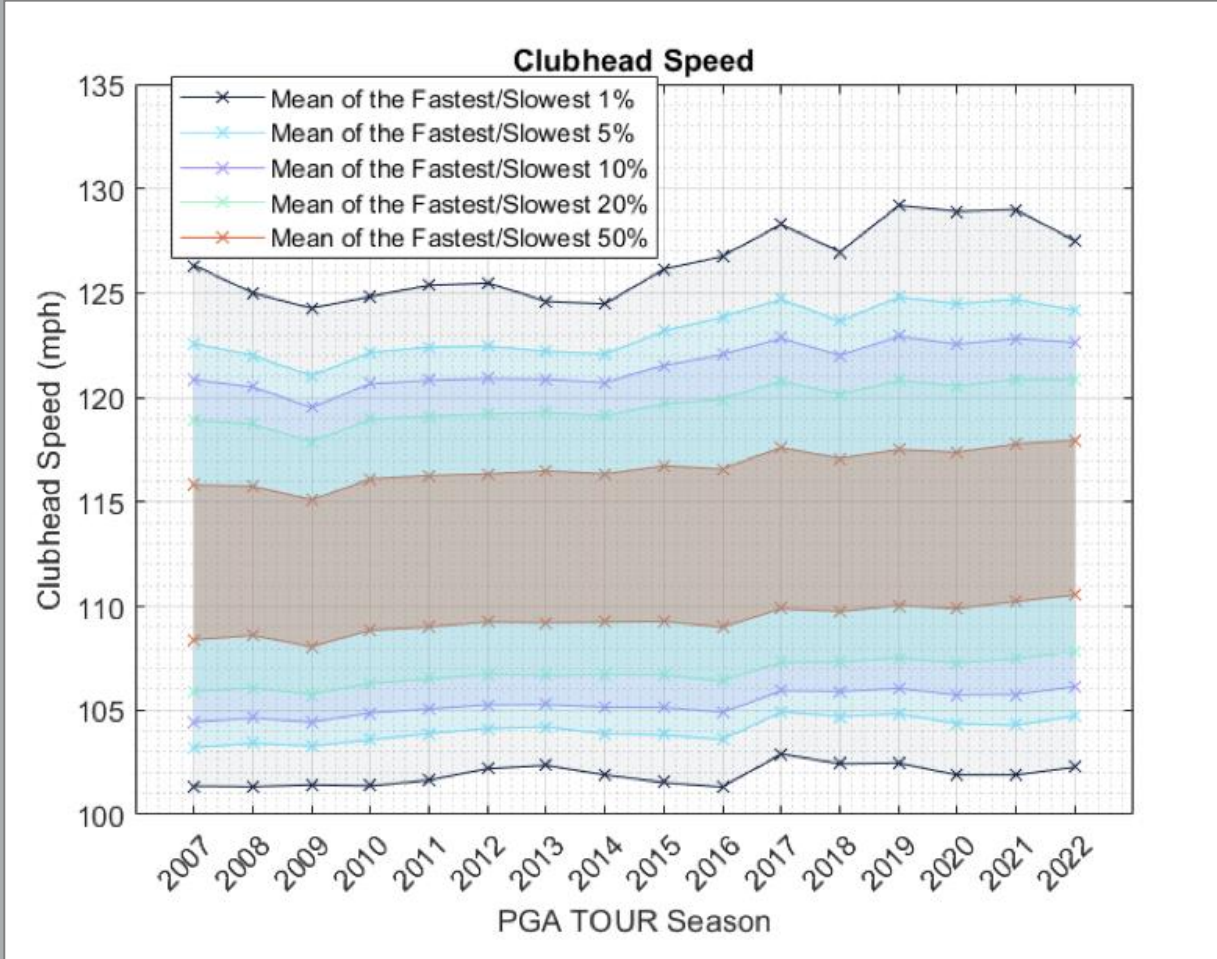
PGA TOUR AVERAGE CLUBHEAD SPEED

- Average clubhead speed in 2022 was 114.6 mph
- The 114.6 mph clubhead speed is well below the current Overall Distance conformance test protocol of 120 mph and significantly below the proposed MLR speed of 127 mph

+2.3mph
Increase in Avg.
Clubhead Speed
Since 2008



FASTEST MEASURED CLUBHEAD SPEEDS ARE TRENDING FLAT



- The mean of the fastest 1% of measured clubhead speeds on the PGA TOUR was flat from 2019-2021 and declined in 2022
- The mean of the fastest 5%, 10%, 20% and 50% of measured clubhead speeds has been flat since 2017
- Many distance leaders have experienced injury issues and/or moderated clubhead speed to maintain more control
- Golf has a built-in governor – players realize success requires a balance of distance and accuracy to shoot lower scores

Source: USGA and R&A 2022 Distance Report

THE DRIVING DISTANCE LEADER TODAY IS NOT LONGER THAN 20 YEARS AGO

- Hank Kuehne's Average Driving Distance in 2003 was 321.4
- Cameron Champ's Average Driving Distance in 2022 was 321.4
- The 20-year average was 317.0
- Current USGA/R&A Overall Distance Standard is 317.0 (plus 3 yard manufacturing tolerance)

PGA TOUR Driving Distance Leaders

Year	Average Driving Distance	Player
2022	321.4	Cameron Champ
2021	323.7	Bryson DeChambeau
2020	322.1	Bryson DeChambeau
2019	317.9	Cameron Champ
2018	319.7	Rory McIlroy
2017	317.2	Rory McIlroy
2016	314.5	J.B. Holmes
2015	317.7	Dustin Johnson
2014	314.3	Bubba Watson
2013	306.3	Luke List
2012	315.5	Bubba Watson
2011	318.4	J.B. Holmes
2010	315.5	Robert Garrigus
2009	312.0	Robert Garrigus
2008	315.1	Bubba Watson
2007	315.2	Bubba Watson
2006	319.6	Bubba Watson
2005	318.9	Scott Hend
2004	314.4	Hank Kuehne
2003	321.4	Hank Kuehne
AVG: 317.0		

GOLF BALL REGULATION IS EFFECTIVE- ELITE DISTANCE HAS PLATEAUED

Driving distance at the elite level is the result of modern-day athleticism and skill, and these key advancements, all of which have plateaued:

Golf-specific fitness and training regimens

- Pursuit of increased speed has limits and injury risk
- Diminishing performance returns and greater dispersion

Launch monitor technology has optimized elite instruction and equipment

- Instructors and fitters all use technology to dial in players
- Players are now optimized for equipment and distance gains

Golf course conditioning and agronomy

- Fairways are already firm and fast; avg. rough height reduced 1.2" from 2004
- Agronomy gains will not be repeated

Equipment innovation

- Balls and clubs are at regulatory maximums for distance
- Shaft length was capped at 46" under Model Local Rule



NON-DRIVE SHOTS CONTRIBUTE THE MOST TO SCORING ADVANTAGE

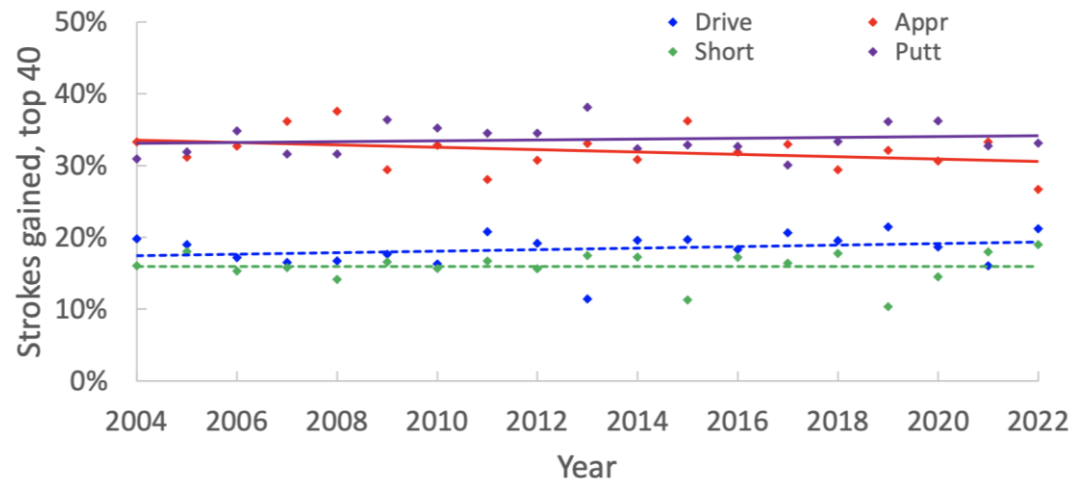


Figure 18: As a fraction of the scoring advantage of winners (in the week of their win), no shot category (driving, approach, short game, putting) has changed significantly.

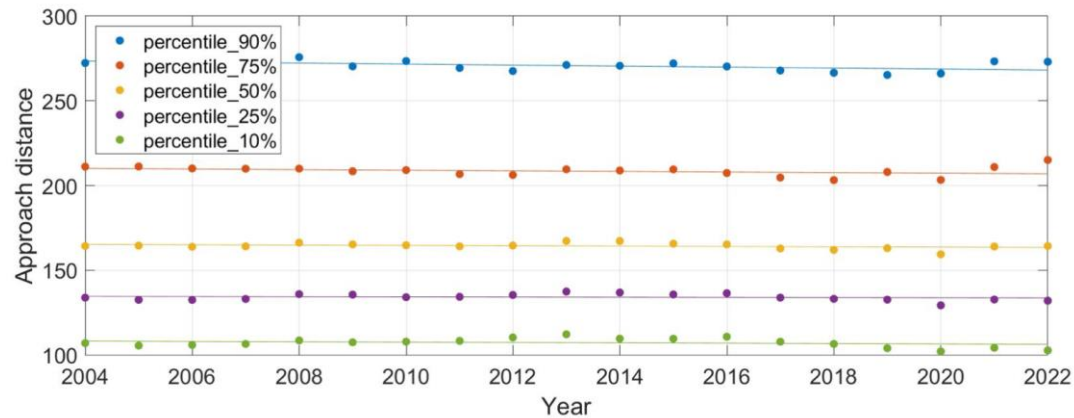


Figure 21: Approach shot distances (second shots on par-4 and par-5 holes) have not changed very much from 2004 to 2022.

- The Top 40 players in season-long Strokes Gained total gain 28% of their scoring advantage from driving and 72% from approach shots, short game and putting
- Winners, in the week they win, gain 18% of their scoring advantage from driving and 82% from approach shots, short game and putting
- Scoring advantage of winners by shot category has not changed significantly from 2004-2022
- Approach shot distances have been consistent since 2004. The number of “wedge or 9-iron” shots in the 50-150 yard range has declined only slightly since 2004

Case Study

2023 US Open Champion
Wyndham Clark



IT TAKES A FULL COMPLEMENT OF SKILLS TO COMPETE AND WIN

- Today's players are athletes and athleticism is a skill
- Distance is a skill, yet doesn't guarantee success - 7 of the Top 10 in Driving Distance in 2022 were outside of the Top 100 in the Official World Golf Ranking

8 th	Driving Distance
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148 th	Driving Accuracy
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33 rd	GIR
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36 th	Scrambling
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44 th	Putting
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144 th	Driving Distance
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8 th	Driving Accuracy
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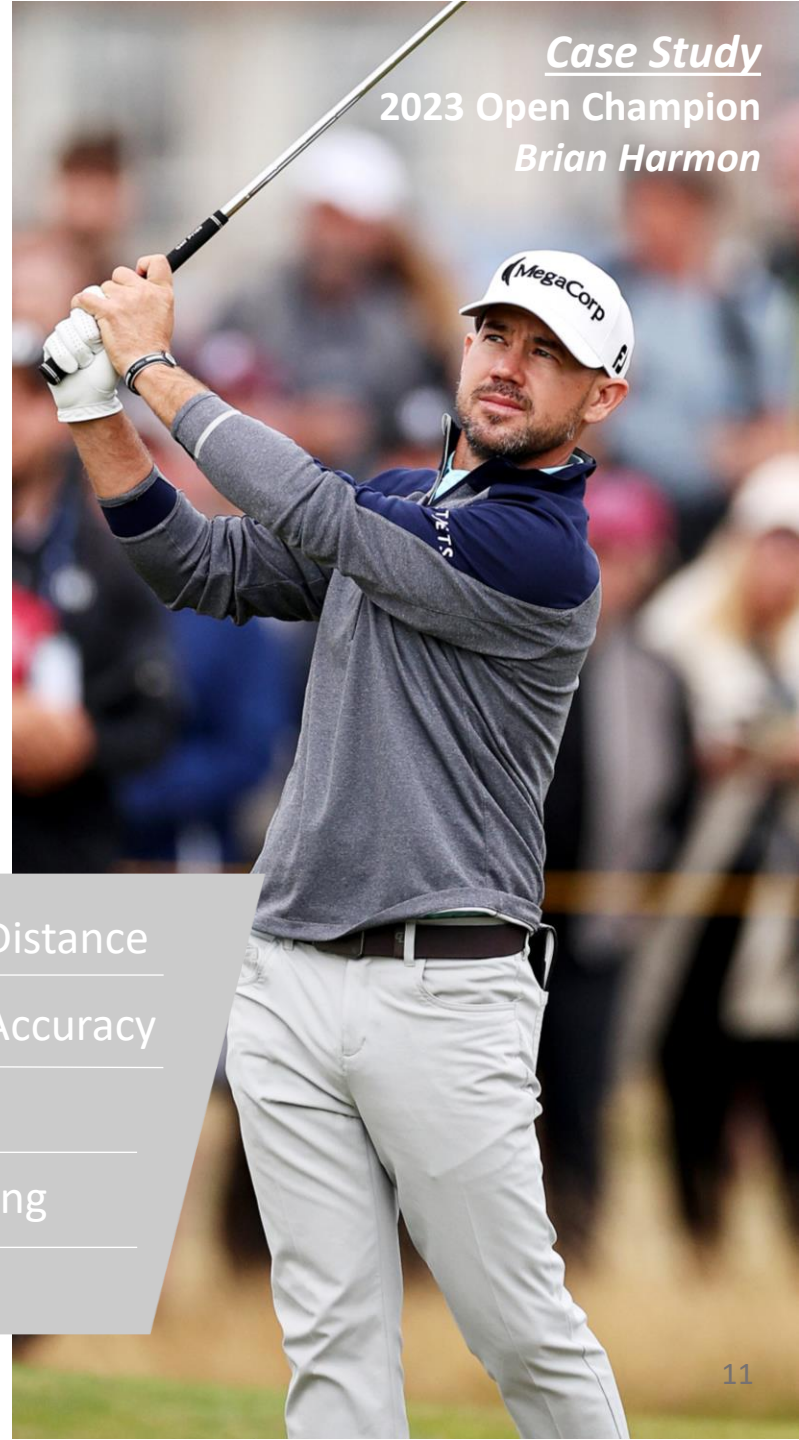
45 th	GIR
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1 st	Scrambling
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38 th	Putting
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Case Study

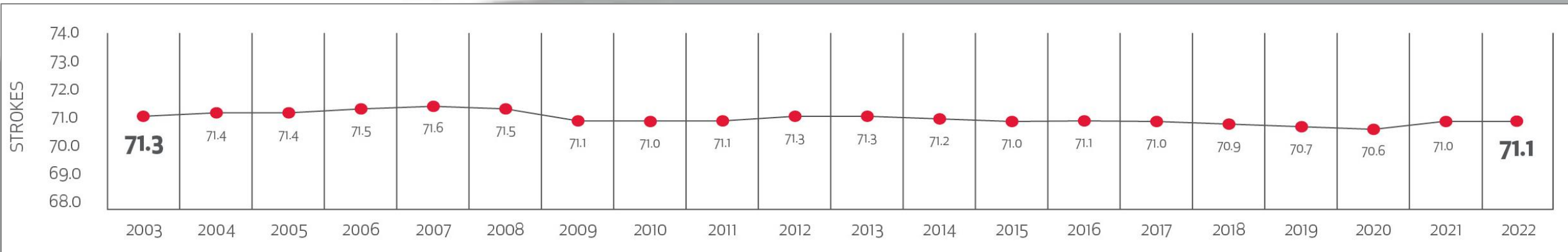
2023 Open Champion
Brian Harmon



PGA TOUR SCORING AVERAGE HAS REMAINED FLAT FOR 20 YEARS

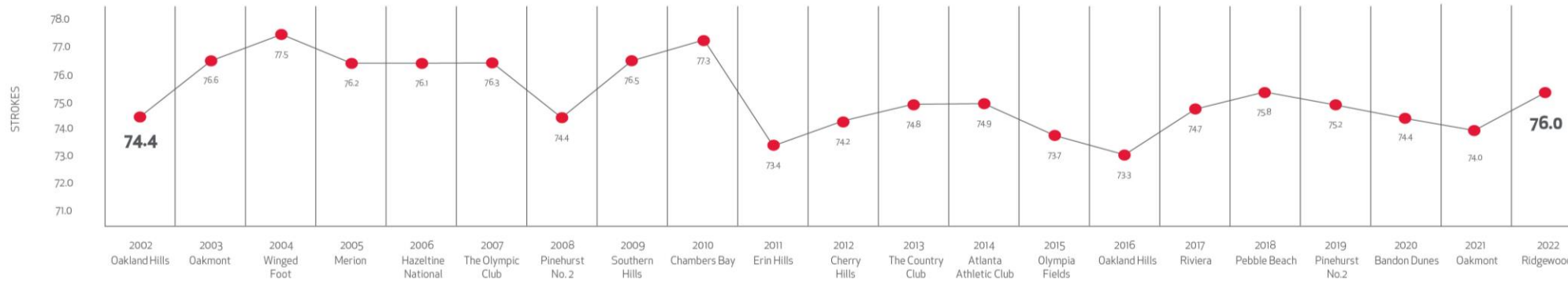
- Scoring average was 71.1 in 2022, compared with 71.3 in 2003
- The game remains challenging even at the elite professional level

71.1
Scoring Average
2003-2022



Elite Amateur Championship Results

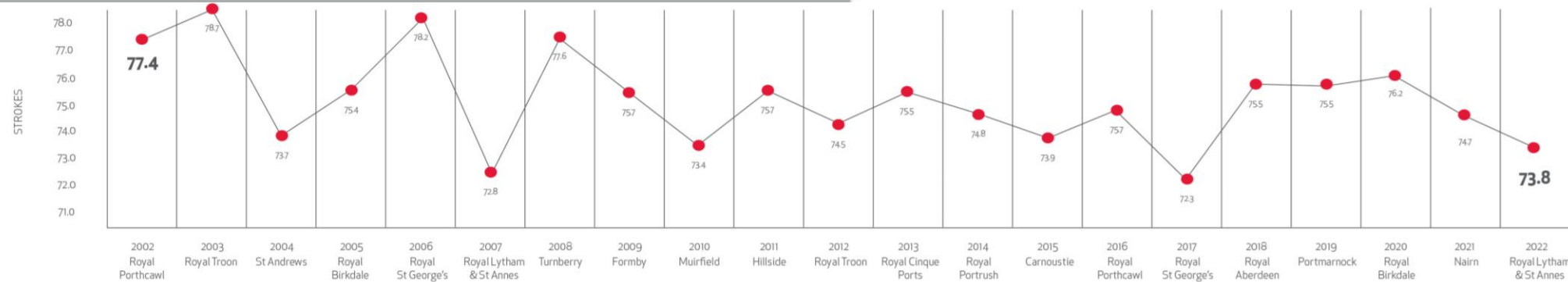
US Amateur (Medal Play)



OVER 20 YEARS
75.2
AVERAGE SCORE

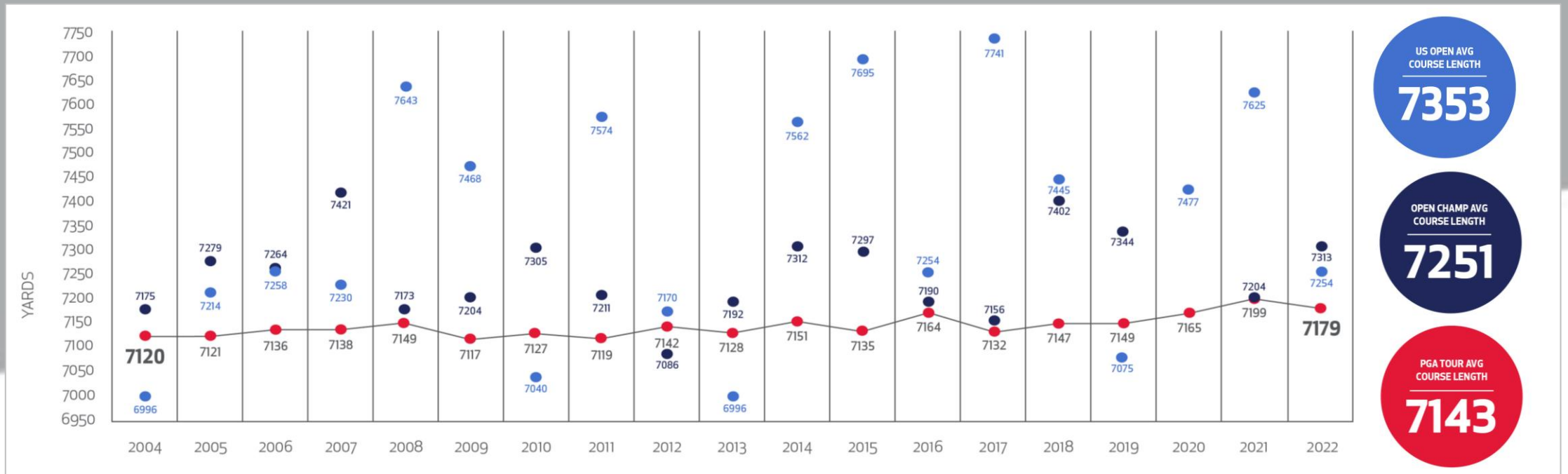
THE GAME REMAINS CHALLENGING AT THE ELITE AMATEUR LEVEL

British Amateur (Medal Play)



OVER 20 YEARS
75.4
AVERAGE SCORE

PGA TOUR AVERAGE COURSE PLAYING LENGTH IS LESS THAN 7,200 YARDS



- Average PGA TOUR course playing length from 2004-2022 is 7,143 yards
- The average actual playing length in 2022 was only 59 yards longer than 2004
- PGA TOUR events/majors are not played from the tips

DATA DOES NOT INDICATE A NEED FOR COURSES TO EXPAND

- Average U.S. 18-hole regulation golf course length is 6,705 yards from the back tees
- 101 courses of 13,102 in the U.S., or less than 1%, have a yardage of over 7,500
- New 18-hole regulation courses built between 2010-2020 averaged 6,652 yards, 274 yards shorter than new courses built from 1990-2000
- Median acreage of maintained turfgrass for 18-hole facilities decreased to 95 acres in 2021 from 98 acres in 2005, a 3% reduction



SUMMARY

- The sport of golf is healthy and well-positioned for the future
- The many skills required for success at the elite level are in balance
- There is no evidence that driving distance has harmed or is likely to harm the game
- Unification is a critical contributor to golf's aspirational appeal and enduring, generational success
- The proposed MLR would cause unnecessary disruption and confusion that would be detrimental to the sport

