Dear Prof. Steve Otto

Thank you for giving us the chance to express our views on the "Notice to Manufacturers" jointly announced conducted by the R&A and USGA on March 14th this year. As the Outside Manufacturing Committee of the Japan Golf Appliances Association, we would like to express the following opinions/comments regarding the "Proposal of Model Local Rules for Golf Ball Compatibility (MLR)".

1. For this MLR introduction

As a JGGA, we have been requesting that it should be applied to "elite golfers" only, without affecting the hitting distance to general golfers.

However, today's golf industry is expanding and growing thanks to covid-19, and this potential MLR could cause to stop the momentum, so I would argue that we should avoid introducing the proposed MLR for golf ball at this timing.

JGGA would think that the introduction should be postponed by at least three years.

2. Adverse effects of MLR

We would like to share some concerns caused by MLR as discussed by JGGA Manufacturing Committee.

(1) The golf goods industry is based on sales through top-down strategies from tours. Introduction of this potential MLR could result in a separation from top-down strategies in ball sales. Users will lose their fascination with tour use, and the appeal of the product will inevitably decrease.

This has a big impact that can shake the backbone of the ball sales business.

(2) Ball manufacturers are forced to develop two types of spin control balls, one for the elite level that meet new MLR and the other for the general after-market. This means the cost increase of entire development at each manufacturer, and they will have to add it into sales price. The additional cost will ultimately be borne by the end-user consumers.

(3) Even if you target an elite-level competition, as you remember with wedge-groove rules, the introduction of MLR caused confusing or misunderstanding and the marketplace will be pulled to the elite-level rule.

These factors (1) to (3) are expected to result in the burden and impact on recreational level golfers, leading to a decrease in the golf population and then, further industrial decline.

3. Other

(1) Considering the introduction of MLR(G-10 regarding the club length, we would request that more concrete and clear target subjects (object levels) should be set for the scope of MLR application.

(2) If we were to draw a clear line and to only target the men's regular tour, it will confuse the style of play for players who play both the regular and senior tours. This can also cause end-user to lose their admiration and interest for the tours.

Again, I would like to thank you for giving us this opportunity to share our opinion with you.

Sincerely, Shozo Tanaka Chairman of Japan Golf Gear Association Manufacturing Committee

差出人: The R&A <<u>equipmentstandards@randa.org</u>> 送信日時: 2023年3月13日 21:59 宛先: Shozo Tanaka (田中晶三) 件名: Notice to Manufacturers

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Please find the following documents for your review:

- 1. <u>Notice to Manufacturers Regarding a Proposed Model Local Rule for Golf Balls</u>
- 2. <u>2022 Annual Drive Distance Report</u>
- 3. Golf Course Effects on Hitting Distance Research Report

In accordance with the Notice to Manufacturers, please provide comments by no later than the deadline of 14 August 2023, to Professor Steve Otto at <u>equipmentstandards@randa.org</u>. Additionally, should you have other comments or questions regarding these documents, please feel free to reach out to Professor Steve Otto as well.

As a courtesy to our manufacturers, we are providing these documents to you the day prior to their public release. These are provided to you in confidence on the basis that you do not share or discuss these documents outside of your organisation prior to that publication.

For any questions, please contact: Professor Steve Otto Chief Technology Officer, The R&A <u>equipmentstandards@randa.org</u>