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December 26th, 2013

Attn: Margie Kotzalas, Chief & Shirley Xu

FSME/MSSA/LB

MailStop T8-E24

U.S. Nuclear Regulatory Commission

Washington, DC 20555

In response to your letter dated Dec 19 2013, there are a few points that we would like to clarify.

Paragraph 2 Re: Label on the watch does not provide the manufacturer of the watch.

Although the timepieces are exempt from labeling, as indicated in your letter dated November 6, 2013, our timepieces do have a label identifying the source of the byproduct, which is of primary importance to our customers. As per the license requirements, that label indeed does not identify the manufacturer or initial transferor of the product.

Please note that the label on the container however, clearly identifies 'Campco, Inc. / Smith & Wesson Watch division' as the initial transferor of the watch – the product - as well as identifying 'mb-microtec' as the manufacturer of the 'sealed light sources (Hydrogen 3) – the byproduct. Please see the attached image of the container label.

Paragraph 3 Re: Smith & Wesson stamp on the back of the watch.

The licensee on our materials license is:

CampCo Inc. , Smith & Wesson Watch Division

Smith & Wesson is an identifying brand name for a series of watches that we sell. All of our watches are distributed by Campco.

Paragraph 4 Re: Misspelling of the source manufacturer's name.

Our product labels and sales literature uniformly identify the source manufacturer of the byproduct as 'mb-microtec'. Any other spelling in our correspondence was unintentional.

I invest a substantial amount of money and resources to finance and maintain our NRC license. I originally requested this minor amendment on June 26 2012. This minor amendment is to update all the records to show that our watches are no longer using SRBT tubes, but safer and better mb-microtec tubes. There is no change to the level of activity, safety standards or design. I have already provided the supporting details on the mb-microtec tubes. SRBT is no longer able to make quality tubes and mb-microtec has become the industry standard for all tubes inside watches approved for importation and distribution under an NRC license.

In your email to me dated Aug 1 2013, you suggested that we could count on some assistance in this minor amendment from Shirley Xu. Please ask your co-workers to help us either by phone or email, by providing us with guidance to be able to comply with your requests.

Wishing you a healthy and happy new year.

Sincerely

A handwritten signature in blue ink, appearing to read "Motti Slodowitz". The signature is stylized and cursive.

Motti Slodowitz

President/CEO

COPY OF MARKINGS ON WATCH BOX.

Watch Distributed by Campco, Inc. /
Smith & Wesson Watch Division.
By product sealed light sources (Hydrogen 3)
manufactured by mb-microtec

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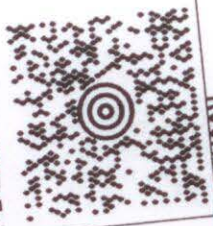
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