

# 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.<sup>1</sup>

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<sup>1</sup> 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.<sup>2</sup>
- 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.<sup>3</sup>

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.<sup>4</sup> 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.<sup>5</sup>

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.

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<sup>2</sup> According to the USGA and R&A 2022 Distance Report

<sup>3</sup> 71.3 in 2003, 71.1 in 2022

<sup>4</sup> According to the PGA TOUR

<sup>5</sup> 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', with a stylized, cursive script.

David Maher  
President and Chief Executive Officer  
Acushnet Company

Cc: Mr. Michael Whan  
Mr. Martin Slumbers



***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

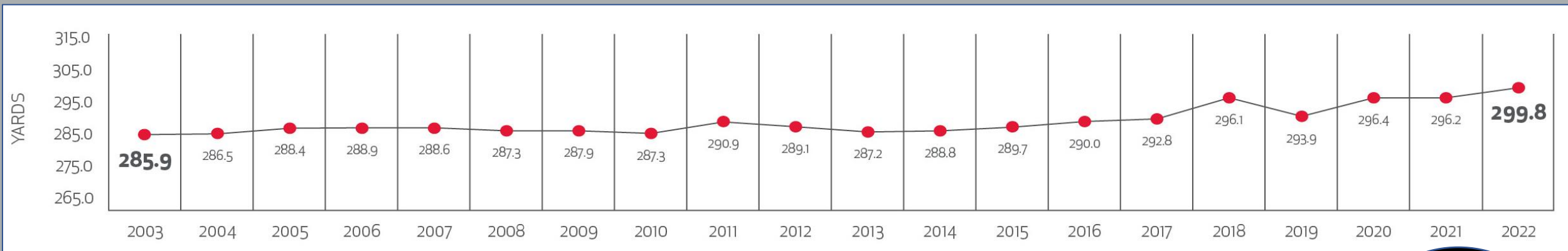
Everyone can play the same courses with the same equipment

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

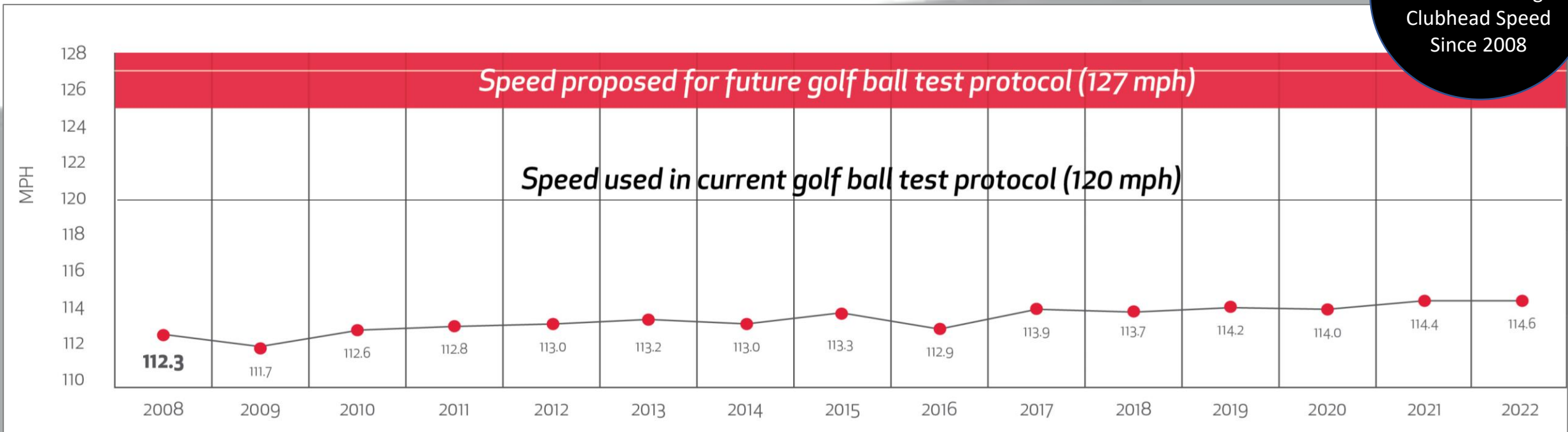
**+0.7 yds**

Average Distance  
increase per year  
since 2003

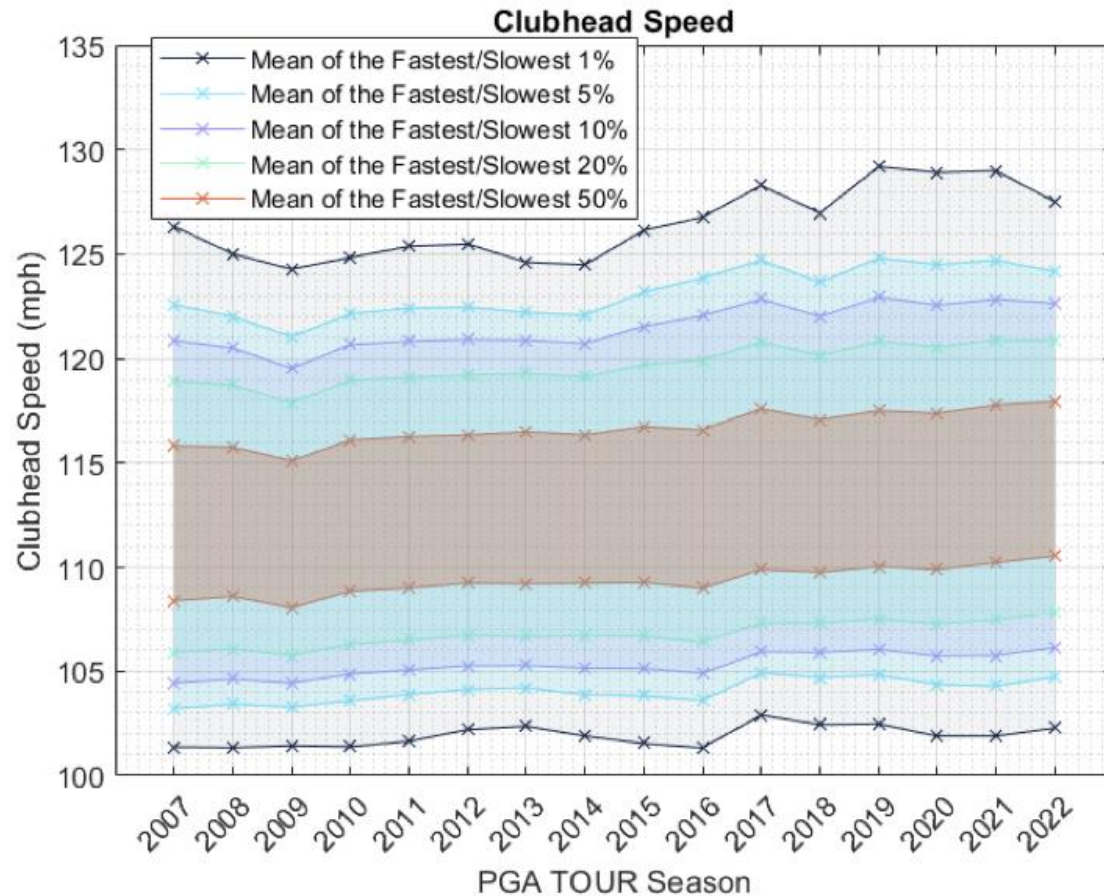
- Distance has only increased an average of 0.7 yards per year since 2003 due to several contributing variables:
  - Golf-specific fitness and training regimens
  - Optimized elite instruction and equipment fitting through launch monitor technology
  - Golf course conditioning and agronomy
  - Equipment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



# 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

# 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

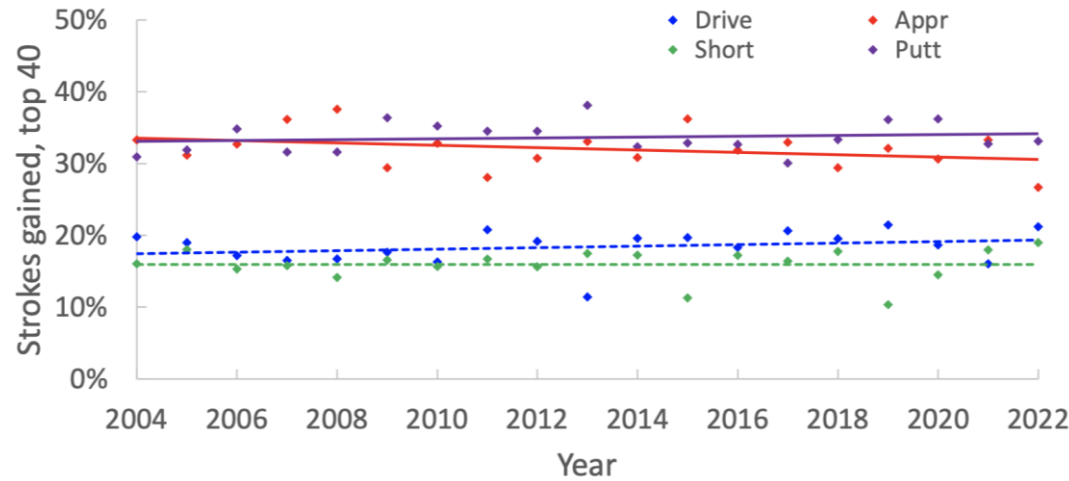
- Fairways are already firm and fast; avg. rough height reduced 1.2" from 2004
- Agronomy gains will not be repeated

## Equipment innovation

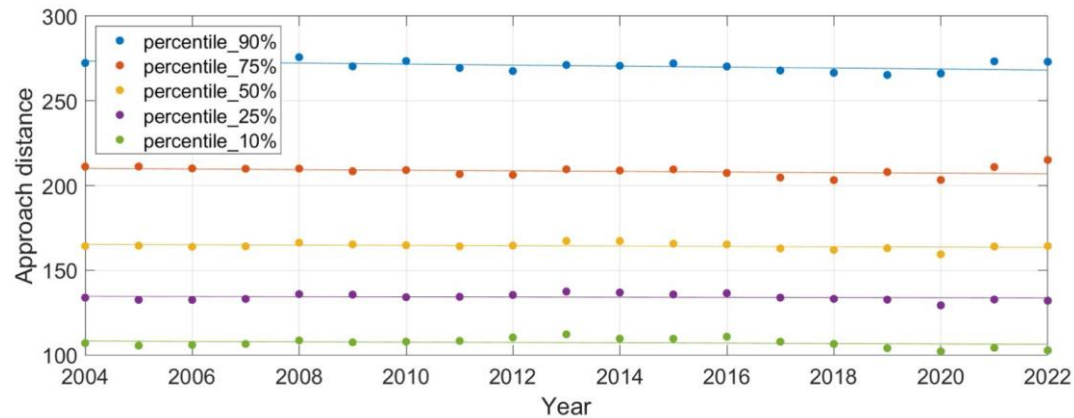
- Balls and clubs are at regulatory maximums for distance
- Shaft length was capped at 46" under Model Local Rule



# 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

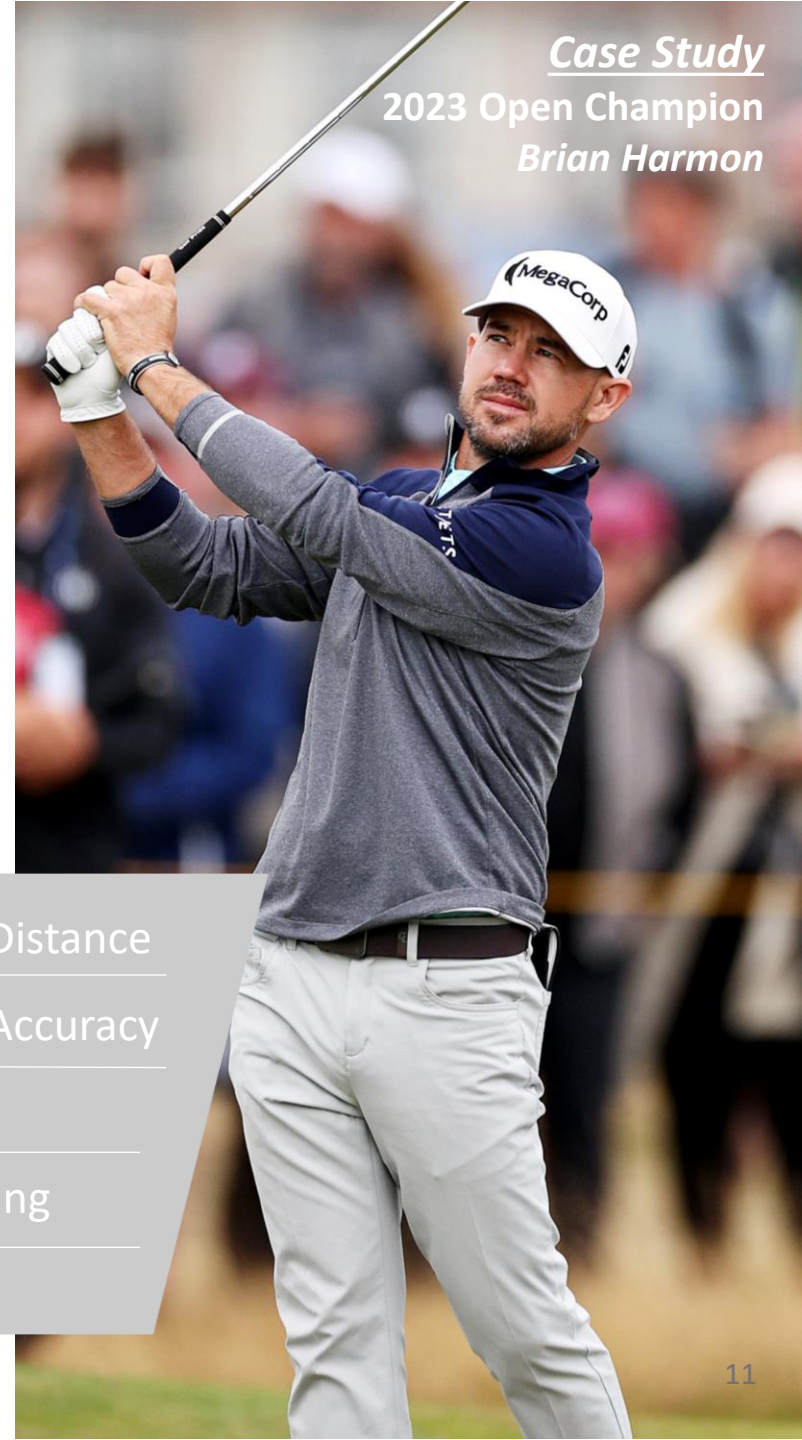
- Today's players are athletes and athleticism is a skill
- Distance is a skill, yet doesn't guarantee success - 7 of the Top 10 in Driving Distance in 2022 were outside of the Top 100 in the Official World Golf Ranking

8 <sup>th</sup>	Driving Distance
148 <sup>th</sup>	Driving Accuracy
33 <sup>rd</sup>	GIR
36 <sup>th</sup>	Scrambling
44 <sup>th</sup>	Putting

144 <sup>th</sup>	Driving Distance
8 <sup>th</sup>	Driving Accuracy
45 <sup>th</sup>	GIR
1 <sup>st</sup>	Scrambling
38 <sup>th</sup>	Putting

## Case Study

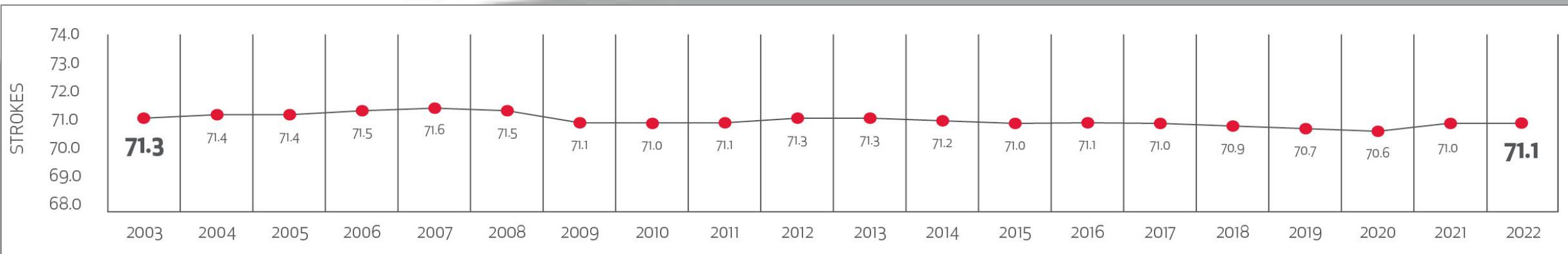
2023 Open Champion  
Brian Harmon



# PGA TOUR SCORING AVERAGE HAS REMAINED FLAT FOR 20 YEARS

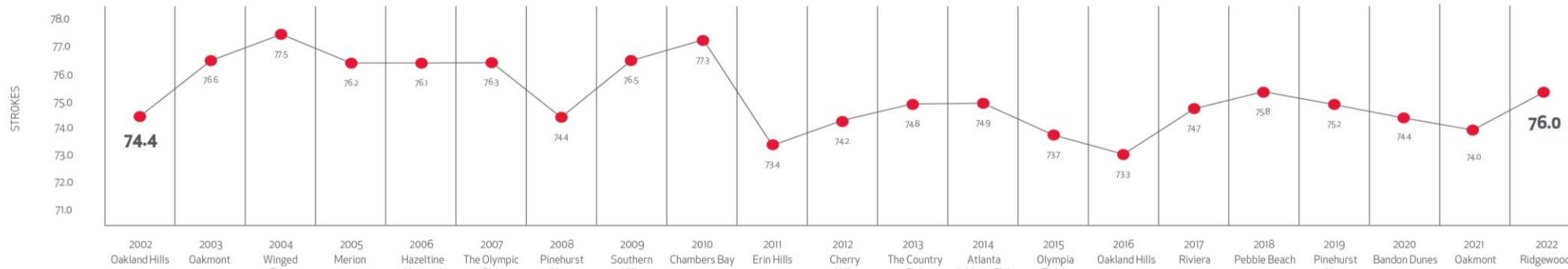
- Scoring average was 71.1 in 2022, compared with 71.3 in 2003
- The game remains challenging even at the elite professional level

**71.1**  
Scoring Average  
2003-2022



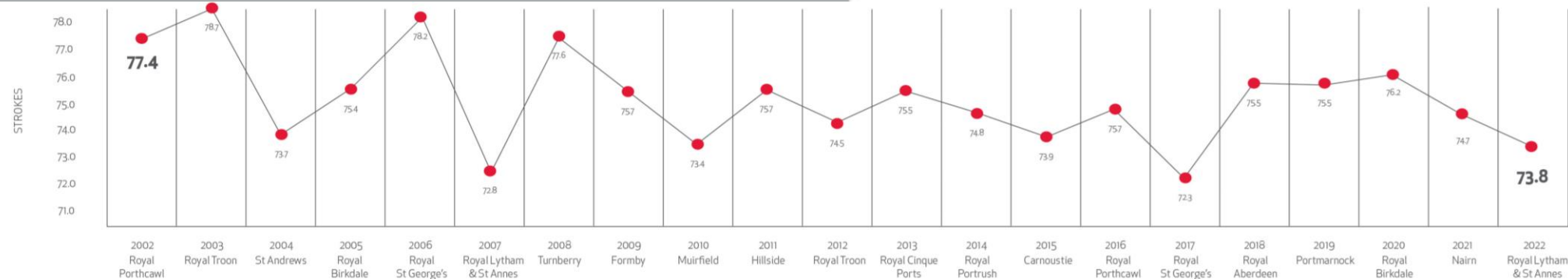
# Elite Amateur Championship Results

## US Amateur (Medal Play)

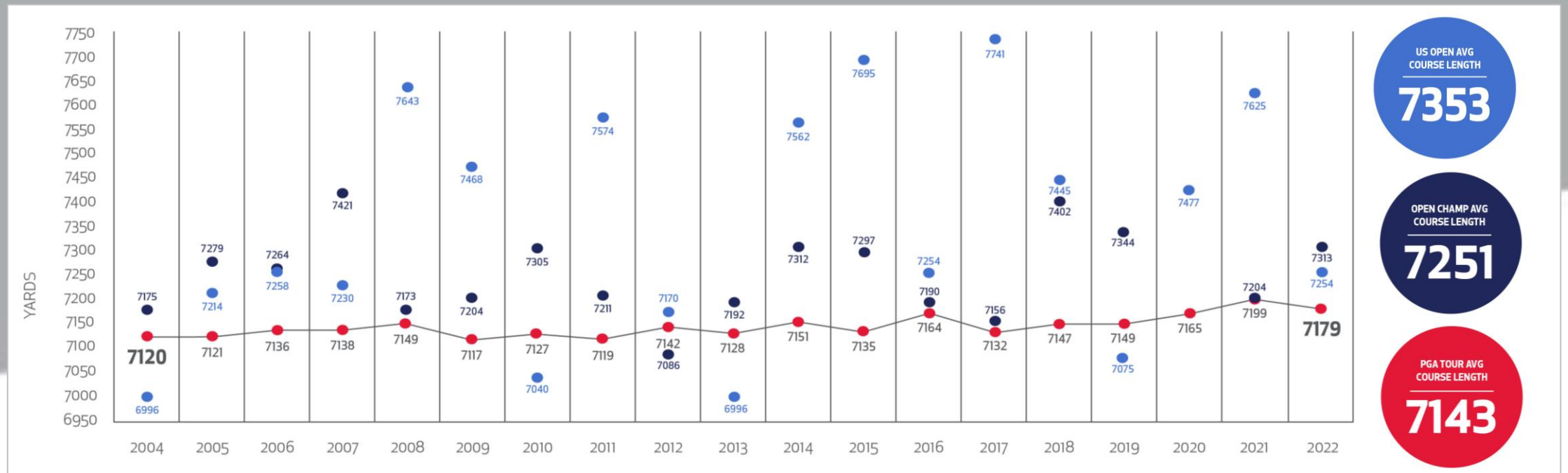


**THE GAME REMAINS CHALLENGING AT THE ELITE AMATEUR LEVEL**

## British Amateur (Medal Play)



# 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





August 8, 2023

Mike Whan, Chief Executive Officer  
United States Golf Association  
77 Liberty Corner Road  
Liberty Corner, NJ 07938

Martin Slumber, Chief Executive Officer  
The Royal & Ancient Golf Club  
St. Andrews KY 16 9JD  
Scotland, United Kingdom

Dear Mike and Martin,

I'm writing today to provide you my and Topgolf Callaway's perspective on the March 14, 2023, proposal for a Model Local Rule (MLR) covering golf balls for elite competition.

Before I do so, I want to express my admiration for your organizations and appreciation for all you do for golf. As the governing bodies of golf worldwide, I know you and your organizations are working hard for what you believe is the good of the game. As I hope you know, we both appreciate what you do and are aligned on this goal. I would also like to acknowledge how thoughtful and inclusive you and your organizations have been in researching and discussing this issue openly.

I will start by saying, as we look at the data along with the state of the game, we do not see an imminent threat and would not recommend a change. In short, the game is in a great place right now, and we believe the distance that elite players achieve helps fuel interest in the game and thus can be viewed as a positive.

Having said this, we recognize that the USGA and R&A have studied the same data and concluded that it is in the best interest of golf, presumably in the long-term, to further limit or "roll back" distance for elite competition. Given this position, we believe the proposed "model local rule" approach is a well-thought-out approach that we would support.

This approach has two clear advantages:

1. It is scientifically sound. By this I mean it will be both effective at limiting distance at elite club head speeds and it is extremely unlikely to be circumvented by future golf ball development.
2. It would have no negative impact on the vast majority of golfers who do not compete in elite competitions. We believe that any reduction of distance for the average golfer could have a negative impact on participation and thus should be avoided.

Having said all this, I understand you are going to be receiving a lot of feedback on this subject and there are a lot of competing viewpoints, including many prominent voices arguing against bifurcation. As you evaluate options, we hope you keep in mind that golf is now in a great place with increasing participation and diversity. As you address a perceived issue in the elite competitive game, we hope you can do so without negatively impacting the balance of golfers by making the game noticeably more difficult for them or obsoleting every approved golf ball currently produced by major manufacturers (a wholesale rollback at currently proposed specifications would do this). Focusing just on the consumer side of this, I'm sure I don't need to remind you that most golfers play the game for recreation or fun and in doing so do not choose to play the same equipment as elite competitors. The majority of golfers play ionomer covered golf balls that are viewed as not suitable for elite competition, play game improvement clubs with significantly different design specifications and shafts relative to golfers that participate in elite competitive golf, and play from vastly different tee boxes.

We started this letter by saying we would not recommend a change. Let me end it by reconfirming this but also conveying that we understand your positive intentions and would essentially welcome and openly support any solution that allows you to achieve your goals without risking the enjoyment of the vast majority of golfers that play the game solely for recreational purposes. In our opinion, the MLR is one way to accomplish this. However, I'm also certain there are others that can be developed; and, if you choose to pursue a different path, we will remain at your service to support that process.

Once again, thank you for listening and for your leadership in the game we all love. As always, we remain aligned in our mutual desire to act in a way that is for the good of the game. To this end, Topgolf Callaway Brands will continue to dedicate ourselves to making the best possible golf equipment, for players of all abilities, consistent with whichever rules the USGA and R&A enact.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chip Brewer".

Chip Brewer  
President & CEO  
Topgolf Callaway Brands Corp.

August 1, 2023

John Spitzer  
USGA, Research and Test Center  
77 Liberty Corner Road  
Far Hills, NJ 07931  
Via email only: [jspitzer@usga.org](mailto:jspitzer@usga.org)

Re: PING's Response to the USGA's March 14, 2023 Notice to Manufacturers regarding its "Proposed Model Local Rule for Elite Competitions to be available beginning January 2026 requiring the use of golf balls that are tested with modified Actual Launch Conditions (ALC) within the Overall Distance Standard (ODS)"

Dear Mr. Spitzer:

Thank you for your invitation to submit questions and comments regarding the above referenced March 14, 2023 Notice to Manufacturers - which we refer to in this response as the "2023 Golf Ball Bifurcation Proposal". PING is opposed to the 2023 Golf Ball Bifurcation Proposal for multiple reasons, including those set forth below.

We are thankful the USGA and the R&A decided not to move forward on the February 1, 2021 "Proposal to Specify the Use of Clubs and/or Balls Intended to Result in Shorter Hitting Distances" (the "2021 Bifurcation Proposal"). While there were many compelling reasons for abandoning the 2021 Bifurcation Proposal - and we noted a number of them in our response to that Proposal - we presume a key reason was the importance of maintaining an important tradition of golf: ensuring the equipment rules apply equally to all, regardless of skill level.

The fact that everyone plays under the same equipment rules has been fundamental to the game for a very long time. This tradition, employed together with your handicap system, cements a strong connection among all golfers - whether you are a famous tour professional, or a new golfer submitting scores for your first handicap. This connection benefits both the professional and the amateur golfer. If equipment rules are bifurcated based on skill level, we believe amateur golfers will feel "disconnected" with the professionals they admire, resulting in harm to the game, to the professional golfers, and to the professional tours. There is simply no compelling reason to take such a risk when both the professional and the amateur game are experiencing growing popularity, and reaping the benefits that come with it. Staying clear of the slippery slope of bifurcation is - alone - a more than sufficient reason to drop the 2023 Golf Ball Bifurcation Proposal.

If adopted, your 2023 Golf Ball Bifurcation Proposal will create other problems as well. While PING currently does not manufacture and/or distribute golf balls, it appears the 2023 Golf Ball Bifurcation Proposal would raise costs for golf ball manufacturers. Designing, manufacturing, and selling golf balls to satisfy two different standards will be more expensive, and ultimately those higher costs will likely be passed on to amateur golfers. Have you considered any less restrictive and/or more innovative ideas that could achieve your goal without harming golf ball manufacturers and the game? If so, please share those results. If not, perhaps that should be the focus of a new effort.

Adopting the 2023 Golf Ball Bifurcation Proposal would also raise costs for golf club manufacturers. We will incur unnecessary research, development and manufacturing expenses stemming from the reasonable demands of touring professionals to modify our clubs in a manner that attempts to mitigate the impact of their playing with a shorter ball – expenses which could better be directed toward innovations that improve the enjoyment of the game for all.

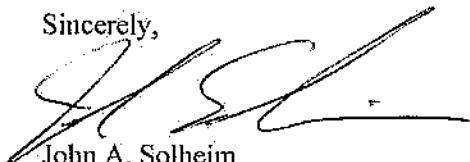
Abandoning one of golf's long held traditions – one set of equipment rules – will be disruptive, and would be particularly unwise at this time in view of the controversial challenges facing professional tournament golf (challenges that are not based on any concerns about golf equipment and/or golf ball distance). At its core, this ongoing disruption to professional tournament golf is fueled by a desire by some to change many aspects of the professional game. We urge you not to amplify these ongoing problems by adopting your own break from one of golf's most important traditions. The game will be better served if the rulemaking bodies decide that improving golf's future will best be realized by embracing the traditions of the game, and strengthening the connections felt among all golfers.

However, there is a change you should make now. One that would benefit the game and the process for equipment rulemaking. Specifically, before offering any new equipment rules, the rulemaking bodies should first evaluate whether their previous equipment rule changes achieved the benefit they claimed in proposing the change, or whether there was little if any impact (other than increasing costs and adding unnecessary regulation to a game that already suffers from too many equipment rules). For example, did the 2010 change to the groove rules have any impact on the game, other than causing multiple millions of dollars of unnecessary manufacturing costs, making multiple millions of clubs that previously conformed to the rules non-conforming, and confusing multiple millions of golfers? That same evaluation should be done, and made available for comments from the golfing community, with respect to all other rules changes (such as CT, shaft length, the long putter and more). Any endeavor, including the game of golf, that seeks to realize its full potential must embrace this level of accountability, whether you make golf equipment, retail golf equipment, manage a golf course, hold golf tournaments, or make golf equipment rules. We hope the USGA and the R&A will choose to direct the vast amount of data available to them, as well as their knowledgeable staff, toward conducting such a review of recent equipment rule changes before proposing any disruptive new ones.

In summary, please do not disrupt the efforts you and countless others have invested in golf over the decades - efforts that have been rewarded and are resulting in a growing sport enjoyed by tens of millions around the world - by breaking from a key tradition and bifurcating the game.

As always, we reserve the right to offer additional comments if/when additional information/ideas or the submissions from others become available. Also, please note that as provided at Section 2 of the Equipment Rulemaking Procedures dated November 2011, we authorize both the USGA and the R&A to publish this response at their respective websites and/or in any other manner either believes will promote the discussion of the subjects addressed herein. We reserve the right to do the same.

Sincerely,



John A. Solheim  
Executive Chairman, PING



John K. Solheim  
President and CEO, PING