



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Bureau of Consumer Protection
Division of Enforcement

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June 13, 2018

VIA FEDEX

Danielle M. Hohos, Esq.
Vice President, Deputy General Counsel
Williams-Sonoma, Inc.
3250 Van Ness Avenue
San Francisco, CA 94109

Dear Ms. Hohos:

We received your submissions on behalf of Williams-Sonoma, Inc. (“Williams-Sonoma” or the “Company”). During our review, we discussed specific concerns relating to potentially deceptive U.S.-origin claims on the pbteen.com website for apparently imported mattress pads, as well as general concerns relating to Williams-Sonoma’s process for ensuring the accuracy of country-of-origin claims on the Company’s website.

In response to our inquiry, Williams-Sonoma took several steps to prevent consumer deception. First, the Company confirmed that it had inadvertently labeled certain Chinese mattress pads as “Crafted in America” on the PBTeen website. You explained that this was an isolated error that occurred when Company personnel transposed two SKU numbers. After receiving notice of our inquiry, Williams-Sonoma immediately corrected the error and updated the PBTeen website to reflect the fact that the affected mattress pads are imported.

Second, you confirmed that the Company follows a three-step process to prevent consumer deception with respect to country-of-origin claims for products on its websites. First, Williams-Sonoma receives and reviews country-of-origin information from vendors. Second, product information teams review country-of-origin statements to confirm that they comply with the FTC’s Enforcement Policy Statement on U.S.-Origin Claims. Third, product information teams correct errors immediately upon discovering inaccurate or incorrect claims. You stated that, as part of the Company’s response to our inquiry, customer care and product information personnel were retrained on appropriate processes and policies.

Based on Williams-Sonoma’s actions and other factors, the staff has decided not to pursue this investigation any further. This action should not be construed as a determination that

there was no violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45. The Commission reserves the right to take such further action as the public interest may require. If you have any questions, you can reach me at (202) 326-2377.

Sincerely,

A handwritten signature in blue ink that reads "J. ENSOR". The signature is stylized with a large initial "J" and a long, sweeping underline.

Julia Solomon Ensor
Staff Attorney