



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

Bureau of Consumer Protection
Division of Enforcement

Julia Solomon Ensor
Attorney

Email: jensor@ftc.gov
Direct Dial: (202) 326-2377

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FEDERAL EXPRESS

Janice Thomson, Esq.
In-House Counsel
San Antonio Shoe, Inc.
1717 SAS Drive
San Antonio, TX 78224

Dear Ms. Thomson:

We received your submissions on behalf of San Antonio Shoe, Inc. ("SAS" or the "Company"). During our review, we discussed concerns that certain SAS marketing materials may have overstated the extent to which the Company sells shoes that are made in the United States. Specifically, Company materials made broad "Made in USA" claims that appeared to apply to all SAS shoes. Although SAS sells some shoes that are made in the United States, SAS also sells shoes made with substantial imported content.

As we discussed, unqualified "Made in USA" claims on marketing materials likely suggest to consumers that all products advertised in those materials are "all or virtually all" made in the United States. Accordingly, to avoid deceiving consumers, you explained that SAS is implementing a corrective action plan to limit SAS's "Made in USA" claims to products that are "all or virtually all" made in the United States. This plan includes: (1) updating claims on the Company website and other marketing materials; (2) applying updated shoebox labels; and (3) instituting a legal review process for U.S.-origin marketing claims.

Based on your statements, 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, appearing to read "J. Ensor".

Julia Solomon Ensor
Staff Attorney