



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

Office of the Secretary

April 2, 2010

Mary Gatch
South Carolina

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Ms. Gatch:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

Although the Commission's initial actions in the "bamboo" textiles area were necessarily brought against a discrete number of companies, the Commission's position with respect to "bamboo" fiber claims applies to all marketers, regardless of size or location. To assist all such businesses wishing to market rayon textile products made from bamboo, the Commission has published an alert for businesses, titled *How to Avoid Bamboozling Your Customers*, which is available at <http://www.ftc.gov/bamboo>.

In your comment, you suggest that the Commission should provide evidence to refute antimicrobial claims regarding "bamboo" textiles. As an initial matter, a seller must possess competent and reliable evidence to substantiate any claims it makes regarding its products. In this case, that includes evidence both that the textile products possess antimicrobial properties *and* that such properties are derived from the bamboo cellulose source and not added to the textile product during manufacturing. The Commission sought evidence from the respondents and found that the respondents were unable to properly substantiate their claims that their textile products retained the antimicrobial properties of bamboo.

The evidence that the Commission has obtained on this issue indicates that rayon made from bamboo does not possess any antimicrobial properties derived from bamboo. Dr. Ian Hardin, of the University of Georgia, recently performed antimicrobial testing on "bamboo" textiles purchased from six different sources and reported the results in March 2009, later publishing his report in an industry journal. Dr. Hardin concluded that "none of the 'bamboo' samples tested had any antimicrobial properties." *An Assessment of the Validity of Claims for "Bamboo" Fibers*, Hardin, I., *et al.*, AATCC Review (October 2009). In addition, many textile experts agree that any properties of the cellulose source, in this case bamboo, are destroyed in the process of manufacturing the rayon textile fiber. Thus, even if such textile products exhibit antimicrobial properties, it is highly unlikely they are derived from the bamboo plant.

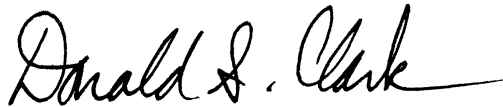
You also suggest that the Commission should improve its guidelines with regard to “biodegradable” claims because “nothing will biodegrade efficiently (or at all) in a typical landfill.” As explained in the Commission’s Environmental Marketing Guides, broad claims such as “biodegradable” should be qualified, where necessary, to avoid misleading or deceiving consumers.

You also suggest that more municipalities are offering curbside composting and request that the Commission provide “product labeling” to assist “consumers in determining which products should be composted at the end of their useful life.” As discussed in the Guides, “compostable” and “biodegradable” have different meanings to consumers, and no claims of “compostable” were raised in the instant case. The Commission’s Guides are not intended to, and do not, set out labels that must be used by marketers in making claims regarding their products. Rather, the Guides are intended to assist marketers by providing information on how consumers interpret some common environmental marketing claims, including both “compostable” and “biodegradable.” Marketers must ensure that the claims they make regarding their products are true, not misleading, and substantiated by competent and reliable evidence.

After consideration of your comments, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. Copies of the Decision and Order and other relevant materials are available on the Commission’s website at <http://www.ftc.gov>.

Thank you again for your comments. It helps the Commission’s analysis to hear from a variety of sources in its work, and we appreciate your interest in this matter.

By direction of the Commission.


Donald S. Clark
Secretary



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Office of the Secretary

April 2, 2010

Mr. Eric Allen
Greenboatstuff LLC
Washington

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Mr. Allen:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

Although the Commission's initial actions in the "bamboo" textiles area were necessarily brought against a discrete number of companies, the Commission's position with respect to "bamboo" fiber claims applies to all marketers, regardless of size or location.

In your comment, you note that you "believe Bamboosa" with regard to the respondents' comments on the production methods used in manufacturing their rayon textile fiber from bamboo, the attributes of their rayon made from bamboo as compared to conventional rayon, and the anti-microbial properties of their textile products.

First and foremost, a seller must possess competent and reliable evidence to substantiate any claims it makes regarding its products. In this case, the Commission sought all such evidence from the respondents and found that the respondents were unable to properly substantiate their claims regarding their textile products.

Moreover, the evidence the Commission has received indicates that there is no significant distinction between rayon textile fibers manufactured using bamboo and rayon manufactured using more traditional cellulose sources. For example, in March 2009 Dr. Ian Hardin, of the University of Georgia, presented the results of his examination of purportedly "bamboo" fiber purchased from six different sources, which he later included in a published paper on the same subject. See *An Assessment of the Validity of Claims for "Bamboo" Fibers*, Hardin, I., *et al.*, AATCC Review (October 2009). In his testing, Dr. Hardin found that there was "little difference to note" between the purported "bamboo" fiber and conventional rayon fiber.

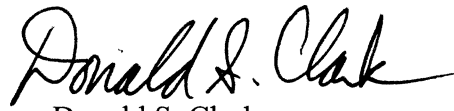
With regard to any purported antimicrobial properties of "bamboo" fiber, the evidence obtained by the Commission indicates that rayon made from bamboo does not possess any antimicrobial properties derived from bamboo. Dr. Ian Hardin also performed antimicrobial

testing on the samples of “bamboo” textiles and concluded that “none of the ‘bamboo’ samples tested had any antimicrobial properties.” *An Assessment of the Validity of Claims for “Bamboo” Fibers*, Hardin, I., *et al.*, AATCC Review (October 2009). In addition, many textile experts agree that any properties of the cellulose source, in this case bamboo, are destroyed in the process of manufacturing the rayon textile fiber. Thus, even if such textile products exhibit antimicrobial properties, it is highly unlikely they are derived from the bamboo plant.

After consideration of your comments, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. Copies of the Decision and Order and other relevant materials are available on the Commission’s website at <http://www.ftc.gov>.

Thank you again for your comments. It helps the Commission’s analysis to hear from a variety of sources in its work, and we appreciate your interest in this matter.

By direction of the Commission.

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Donald S. Clark
Secretary



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Office of the Secretary

April 2, 2010

Mac Christopher
South Carolina

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Mr. Christopher:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

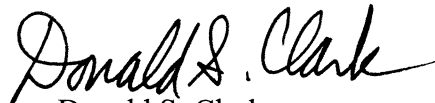
Although the Commission's initial actions in the "bamboo" textiles area were necessarily brought against a discrete number of companies, the Commission's position with respect to "bamboo" fiber claims applies to all marketers, regardless of size or location.

With regard to any purported antimicrobial properties of "bamboo" fiber, the evidence obtained by the Commission indicates that rayon made from bamboo does not possess any antimicrobial properties derived from bamboo. Dr. Ian Hardin, of the University of Georgia, recently performed antimicrobial testing on "bamboo" textiles purchased from six different sources and reported the results in March 2009, later publishing his report in an industry journal. Dr. Hardin concluded that "none of the 'bamboo' samples tested had any antimicrobial properties." *An Assessment of the Validity of Claims for "Bamboo" Fibers*, Hardin, I., *et al.*, AATCC Review (October 2009). In addition, many textile experts agree that any properties of the cellulose source, in this case bamboo, are destroyed in the process of manufacturing the rayon textile fiber. Thus, even if such textile products exhibit antimicrobial properties, it is highly unlikely they are derived from the bamboo plant.

After consideration of your comments, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. Copies of the Decision and Order and other relevant materials are available on the Commission's website at <http://www.ftc.gov>.

Thank you again for your comments. It helps the Commission's analysis to hear from a variety of sources in its work, and we appreciate your interest in this matter.

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Donald S. Clark
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April 2, 2010

Mrs. Rebecca Flores
North Carolina

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Mrs. Flores:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.


Although the Commission's initial actions in the "bamboo" textiles area were necessarily brought against a discrete number of companies, the Commission's position with respect to "bamboo" fiber claims applies to all marketers, regardless of size or location.

With regard to any purported antimicrobial properties of "bamboo" fiber, the evidence obtained by the Commission indicates that rayon made from bamboo does not possess any antimicrobial properties derived from bamboo. Dr. Ian Hardin, of the University of Georgia, recently performed antimicrobial testing on "bamboo" textiles purchased from six different sources and reported the results in March 2009, later publishing his report in an industry journal. Dr. Hardin concluded that "none of the 'bamboo' samples tested had any antimicrobial properties." *An Assessment of the Validity of Claims for "Bamboo" Fibers*, Hardin, I., *et al.*, AATCC Review (October 2009). In addition, many textile experts agree that any properties of the cellulose source, in this case bamboo, are destroyed in the process of manufacturing the rayon textile fiber. Thus, even if such textile products exhibit antimicrobial properties, it is highly unlikely they are derived from the bamboo plant.

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April 2, 2010

Mr. Steven LeRoy
Minnesota

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Mr. LeRoy:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.


Although the Commission's initial actions in the "bamboo" textiles area were necessarily brought against a discrete number of companies, the Commission's position with respect to "bamboo" fiber claims applies to all marketers, regardless of size or location.

The evidence the Commission has received indicates that there is no significant distinction between rayon textile fibers manufactured using bamboo and rayon manufactured using more traditional cellulose sources. For example, in March 2009 Dr. Ian Hardin, of the University of Georgia, presented the results of his examination of purportedly "bamboo" fiber purchased from six different sources, which he later included in a published paper on the same subject. *See An Assessment of the Validity of Claims for "Bamboo" Fibers*, Hardin, I., *et al.*, AATCC Review (October 2009). In his testing, Dr. Hardin found that there was "little difference to note" between the purported "bamboo" fiber and conventional rayon fiber. However, if rayon is made using bamboo cellulose, then a seller may describe that fiber as "rayon made from bamboo."

After consideration of your comments, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. Copies of the Decision and Order and other relevant materials are available on the Commission's website at <http://www.ftc.gov>.

Thank you again for your comments. It helps the Commission's analysis to hear from a variety of sources in its work, and we appreciate your interest in this matter.

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Donald S. Clark
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Office of the Secretary

April 2, 2010

Lilly
North Carolina

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Lilly:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

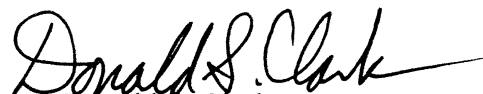
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After consideration of your comments, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. Copies of the Decision and Order and other relevant materials are available on the Commission's website at <http://www.ftc.gov>.

Thank you again for your comments. It helps the Commission's analysis to hear from a variety of sources in its work, and we appreciate your interest in this matter.

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April 2, 2010

M. Lloyd
North Carolina

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear M. Lloyd:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

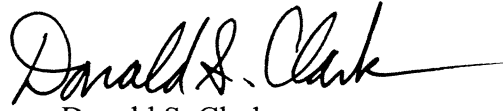
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After consideration of your comments, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. Copies of the Decision and Order and other relevant materials are available on the Commission's website at <http://www.ftc.gov>.

Thank you again for your comments. It helps the Commission's analysis to hear from a variety of sources in its work, and we appreciate your interest in this matter.

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Donald S. Clark
Secretary



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April 2, 2010

Poje

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Poje:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. In part, your comment addresses the Commission's position with regard to unqualified biodegradable claims. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

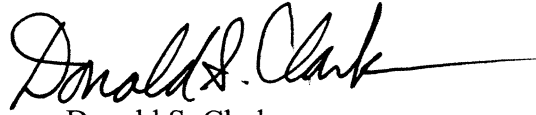
The Commission does not set scientific standards for biodegradability but seeks to protect consumers from being deceived or misled by marketers' claims. In that regard, the Commission has issued Environmental Marketing Guides to educate marketers regarding how consumers perceive certain terms, so that marketers can avoid deceiving or misleading consumers by using those terms in a manner inconsistent with consumer understanding. As you note in your comment, the Commission's position is that consumers interpret unqualified claims of "biodegradable" to mean that "the entire product or package will completely break down and return to nature, i.e., decompose into elements found in nature within a reasonably short period of time after customary disposal." 16 C.F.R. § 260.7(b). Thus, unless the marketer possesses competent and reliable scientific evidence that a product will "completely break down and return to nature, i.e., decompose into elements found in nature within a reasonably short period of time after customary disposal," an unqualified claim of biodegradability is misleading to consumers.

You also specifically question whether a "reasonably short period of time" is an important element to a claim of biodegradability. The Commission has determined that consumers interpret unqualified claims of "biodegradable" to mean that the product will break down and return to nature *in a reasonably short period of time* after customary disposal. However, as explained in the Environmental Marketing Guides, claims of biodegradability may be qualified to avoid consumer deception about the rate and extent of degradation. *See* 16 C.F.R. § 260.7(b).

After consideration of your comments, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. Copies of the Decision and Order and other relevant materials are available on the Commission's website at <http://www.ftc.gov>.

Thank you again for your comments. It helps the Commission's analysis to hear from a variety of sources in its work, and we appreciate your interest in this matter.

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Donald S. Clark
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April 2, 2010

Sandy Saintsing
New Jersey

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Sandy Saintsing:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

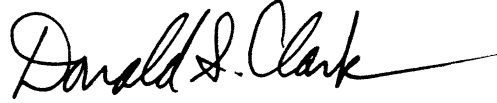
The evidence the Commission has received indicates that there is no significant distinction between rayon textile fibers manufactured using bamboo and rayon manufactured using more traditional cellulose sources. For example, in March 2009 Dr. Ian Hardin, of the University of Georgia, presented the results of his examination of "bamboo" fiber purchased from six different sources, which he later included in a published paper on the same subject. *See An Assessment of the Validity of Claims for "Bamboo" Fibers*, Hardin, I., *et al.*, AATCC Review (October 2009). In his testing, Dr. Hardin found that there was "little difference to note" between the purported "bamboo" fiber and conventional rayon fiber.

With regard to any purported antimicrobial properties of "bamboo" fiber, the evidence obtained by the Commission indicates that rayon made from bamboo does not possess any antimicrobial properties derived from bamboo. Dr. Ian Hardin also performed antimicrobial testing on the samples of "bamboo" textiles and concluded that "none of the 'bamboo' samples tested had any antimicrobial properties." *An Assessment of the Validity of Claims for "Bamboo" Fibers*, Hardin, I., *et al.*, AATCC Review (October 2009). In addition, many textile experts agree that any properties of the cellulose source, in this case bamboo, are destroyed in the process of manufacturing the rayon textile fiber. Thus, even if such textile products exhibit antimicrobial properties, it is highly unlikely they are derived from the bamboo plant.

After consideration of your comments, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. Copies of the Decision and Order and other relevant materials are available on the Commission's website at <http://www.ftc.gov>.

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Donald S. Clark
Secretary



UNITED STATES OF AMERICA
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Office of the Secretary

April 2, 2010

Thomas Wheeler

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Mr. Wheeler:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

Although the Commission's initial actions in the "bamboo" textiles area were necessarily brought against a discrete number of companies, the Commission's position with respect to these "bamboo" fiber claims applies to all marketers, regardless of size or location.

While the Commission appreciates your opinion regarding the character of one of the respondents, the lawfulness of the claims at issue depends on whether consumers are likely to be misled or deceived by the respondents' representations, not whether the respondents act intentionally to deceive people. Thus, the representations may be deceptive even if the individual respondents were not knowingly trying to deceive consumers. Moreover, the proposed consent agreement is a settlement between the parties, which does not involve any finding of wrongdoing or admission of liability. As a result, by agreeing to the proposed consent agreement, the respondents are not admitting to – nor are there any findings of – any false or deceptive acts or practices.

You suggest that the Commission should focus its efforts on possible misrepresentations by the suppliers used by the respondents, specifically foreign manufacturers of rayon textile fiber made from bamboo. However, every marketer is responsible for ensuring that the claims it makes about the products it sells are true, non-misleading, and substantiated by competent and reliable evidence.

You also question whether the Commission is stating that "Rayon derived from bamboo isn't bamboo anymore." In labeling and advertising of textile fiber products, the law requires that sellers use recognized generic fiber names to describe the constituent fibers. If the fiber is a natural, not man-made fiber, then the sellers must use the generic name for that fiber, such as cotton or silk. If the fiber is manufactured – meaning that, at some point during the creation of that textile fiber, it did not exist as a fiber – then the seller must use a generic name recognized by the Commission. Using the same generic fiber names to describe textile fibers regardless of

what company manufactures or sells a textile product creates consistency across the marketplace, thereby avoiding consumer deception and ensuring that consumers will be able to determine the type of fibers in the textile products they purchase.

Under these laws, if a textile product is comprised of actual bamboo fibers – fibers taken directly from the bamboo grass – then the proper generic name would be “bamboo.” If, however, the bamboo cellulose is used to create a rayon fiber (which requires that the cellulose be dissolved in acid during the manufacturing process), then the fiber must be called “rayon” or another term recognized by the Commission. If the rayon is made using bamboo cellulose, however, then the seller may describe that fiber as “rayon made from bamboo.”

With regard to whether rayon made from bamboo is distinct from conventional rayon, the evidence the Commission has received indicates that there is no significant distinction between rayon textile fibers manufactured using bamboo and rayon manufactured using more traditional cellulose sources. For example, in March 2009 Dr. Ian Hardin, of the University of Georgia, presented the results of his examination of purportedly “bamboo” fiber purchased from six different sources, which he later included in a published paper on the same subject. *See An Assessment of the Validity of Claims for “Bamboo” Fibers*, Hardin, I., *et al.*, AATCC Review (October 2009). In his testing, Dr. Hardin found that there was “little difference to note” between the purported “bamboo” fiber and conventional rayon fiber.

After consideration of your comments, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. Copies of the Decision and Order and other relevant materials are available on the Commission’s website at <http://www.ftc.gov>.

Thank you again for your comments. It helps the Commission’s analysis to hear from a variety of sources in its work, and we appreciate your interest in this matter.

By direction of the Commission.

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Donald S. Clark
Secretary



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WASHINGTON, D.C. 20580

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April 2, 2010

Mr. Michael Beatty
M.B. Builders, LLC
South Carolina

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Mr. Beatty:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

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April 2, 2010

Mr. C. Bristow
North Carolina

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Mr. Bristow:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

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April 2, 2010

Ms. Jennie Cudmore
Crunchy Granola Baby
Massachusetts

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Ms. Cudmore:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

Although the Commission's initial actions in the "bamboo" textiles area were necessarily brought against a discrete number of companies, the Commission's position with respect to "bamboo" fiber claims applies to all marketers, regardless of size or location.

After consideration of your comments, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. Copies of the Decision and Order and other relevant materials are available on the Commission's website at <http://www.ftc.gov>.

Thank you again for your comments. It helps the Commission's analysis to hear from a variety of sources in its work, and we appreciate your interest in this matter.

By direction of the Commission.

A handwritten signature in cursive script that reads "Donald S. Clark".

Donald S. Clark
Secretary



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

Office of the Secretary

April 2, 2010

Jennifer George
South Carolina

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Ms. George:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

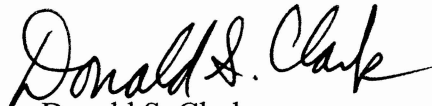
Although the Commission's initial actions in the "bamboo" textiles area were necessarily brought against a discrete number of companies, the Commission's position with respect to "bamboo" fiber claims applies to all marketers, regardless of size or location.

The evidence the Commission has received indicates that there is no significant distinction between rayon textile fibers manufactured using bamboo and rayon manufactured using more traditional cellulose sources. For example, in March 2009 Dr. Ian Hardin, of the University of Georgia, presented the results of his examination of purportedly "bamboo" fiber purchased from six different sources, which he later included in a published paper on the same subject. *See An Assessment of the Validity of Claims for "Bamboo" Fibers*, Hardin, I., *et al.*, AATCC Review (October 2009). In his testing, Dr. Hardin found that there was "little difference to note" between the purported "bamboo" fiber and conventional rayon fiber. However, if rayon is made using bamboo cellulose, then a seller may describe that fiber as "rayon made from bamboo."

After consideration of your comments, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. Copies of the Decision and Order and other relevant materials are available on the Commission's website at <http://www.ftc.gov>.

Thank you again for your comments. It helps the Commission's analysis to hear from a variety of sources in its work, and we appreciate your interest in this matter.

By direction of the Commission.


Donald S. Clark
Secretary



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

Office of the Secretary

April 2, 2010

Hall
Illinois

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Hall:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

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Thank you again for your comments. It helps the Commission's analysis to hear from a variety of sources in its work, and we appreciate your interest in this matter.

By direction of the Commission.

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Donald S. Clark
Secretary



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

Office of the Secretary

April 2, 2010

Dr. Eugene Johnson
South Carolina

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Dr. Johnson:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

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Donald S. Clark
Secretary



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

Office of the Secretary

April 2, 2010

Ms. Debbie Wilklow
South Carolina

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Ms. Wilklow:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

After consideration of your comments, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. Copies of the Decision and Order and other relevant materials are available on the Commission's website at <http://www.ftc.gov>.

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Donald S. Clark
Secretary



UNITED STATES OF AMERICA
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WASHINGTON, D.C. 20580

Office of the Secretary

April 2, 2010

Mr. Todd Wilklow
South Carolina

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Mr. Wilklow:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

Although the Commission's initial actions in the "bamboo" textiles area were necessarily brought against a discrete number of companies, the Commission's position with respect to "bamboo" fiber claims applies to all marketers, regardless of size or location.

While the Commission appreciates your opinion regarding the character of the respondents, the lawfulness of the claims at issue depends on whether consumers are likely to be misled or deceived by the respondents' representations, not whether the respondents act intentionally to deceive people. Thus, the representations may be deceptive even if the individual respondents were not knowingly trying to deceive consumers. Moreover, the proposed consent agreement is a settlement between the parties, which does not involve any finding of wrongdoing or admission of liability. As a result, by agreeing to the proposed consent agreement, the respondents are not admitting to – nor are there any findings of – any false or deceptive acts or practices.

After consideration of your comments, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. Copies of the Decision and Order and other relevant materials are available on the Commission's website at <http://www.ftc.gov>.

Thank you again for your comments. It helps the Commission's analysis to hear from a variety of sources in its work, and we appreciate your interest in this matter.

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Donald S. Clark
Secretary



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FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Office of the Secretary

April 2, 2010

Mr. David Zidlick
South Carolina

RE: *In the Matter of The M Group, Inc., d/b/a Bamboosa, et al.* (Docket No. 9340)

Dear Mr. Zidlick:

Thank you for your comments regarding the proposed consent agreements accepted by the Federal Trade Commission in the above-referenced matters. The Commission gave your comments serious consideration and placed them on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34.

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Thank you again for your comments. It helps the Commission's analysis to hear from a variety of sources in its work, and we appreciate your interest in this matter.

By direction of the Commission.


Donald S. Clark
Secretary