



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

October 29, 2013

**FEDERAL EXPRESS**

Nicholas S. Lee, Esq.  
Bishop Diehl & Lee, Ltd.  
1750 East Golf Road, Suite 390  
Schaumburg, IL 60173

Dear Mr. Lee:

We received your submissions dated August 9, 2013, August 15, 2013, September 30, 2013, and October 25, 2013, on behalf of Dental USA, Inc. ("Dental USA" or the "Company"). After reviewing those submissions, we identified certain statements in Dental USA's marketing materials that could mislead consumers about the extent to which Dental USA's products are made in the United States. Specifically, although some of the Company's dental instruments are made or assembled in the United States, others are imported in a partially finished state.

In response to communications from Commission staff, you explained that Dental USA implemented a remedial action plan to correct its representations. This plan included: (1) conducting a comprehensive review of all Dental USA's marketing materials; (2) deleting potentially misleading or overly broad statements from Dental USA's website and catalogues; and (3) clarifying Dental USA's policy for marking products with "Made in the USA."

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 black ink, appearing to read "J. Ensor".

Julia Solomon Ensor  
Staff Attorney