



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Division of Advertising Practices

January 27, 2015

Andrea C. Levine, Esq.  
Senior Vice President, Director  
National Advertising Division  
112 Madison Avenue, 3<sup>rd</sup> floor  
New York, NY 10016

Re: Advertising for Cortec Corp.'s Vapor Corrosion Inhibiting Film

Dear Ms. Levine:

On December 18, 2014, you referred an NAD compliance investigation to the Federal Trade Commission regarding claims made by Cortec Corporation about a competitor's vapor corrosion inhibiting products. According to the materials you submitted, the Cortec competitor, Northern Technologies International Corporation ("NTIC") took issue with statements in several emails Cortec sent to distributors regarding the results of testing performed on NTIC's products.

Upon review of this matter, we have determined not to take action at this time. In arriving at this conclusion, we considered a number of factors related to resource allocation and enforcement priorities, including the nature of the product (industrial-use vapor corrosion inhibiting films, typically purchased by equipment and systems manufacturers) as well as the nature of any FTC Act violation and the type and severity of any consumer injury. The Commission reserves the right to take such further action as the public interest may require.

Very truly yours,

Mary K. Engle  
Associate Director for Advertising Practices