



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

Division of Advertising Practices

March 23, 2009

Greg Lam, Esq.
Copilevitz & Canter, LLC
310 W. 20th, Suite 300
Kansas City, MO 64108

Re: *Baby Bee Bright Corporation*, File No. 082-3018

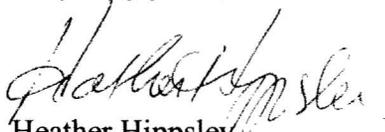
Dear Mr. Lam:

As you know, the staff of the Federal Trade Commission's Division of Advertising Practices has conducted an investigation into whether your client, the Baby Bee Bright Corporation ("Baby Bee Bright"), violated Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, in connection with its marketing of the Baby Bee Bright prenatal audio system. Specifically, FTC staff was concerned about Baby Bee Bright's representations that its prenatal audio system provided cognitive development and educational benefits to babies.

Upon careful review of the matter, including non-public information submitted to the staff, we have determined not to recommend enforcement action at this time. Among the factors we considered are changes made recently to the Baby Bee Bright website, product packaging, and other promotional materials removing the claims of concern, as well as Baby Bee Bright's representations that the company will take appropriate steps to ensure that any future advertising claims of prenatal educational and/or developmental benefit are adequately substantiated.

This action is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may warrant.

Very truly yours,


Heather Hipsley
Acting Associate Director