



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
600 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20580

Division of Enforcement
Bureau of Consumer Protection

May 29, 2012

FEDERAL EXPRESS

Mike Bosley
President
Beams Industries, Inc.
6420 South Air Depot
Oklahoma City, Oklahoma 73135

Dear Mr. Bosley:

The staff of the Federal Trade Commission ("FTC") has received your submissions of April 12, 2012 and May 21, 2012, on behalf of Beams Industries ("Beams"). In our correspondence and discussions, you indicated that although Beams' products have more than *de minimis* foreign content, it based its unqualified "Made in USA" claims upon the fact that these products are sewn, assembled, and tested in the United States and include U.S. components. In light of guidance provided by Commission staff, however, you now indicate that Beams no longer makes unqualified "Made in USA" claims for products that are not all or virtually all made in the United States.

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 ("FTC 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, I can be reached at (202) 326-2890.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Koss", with a long horizontal flourish extending to the right.

Laura Koss
Staff Attorney