



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**

Jeffery L. Biegun  
President/CEO  
Seatbelt Solutions  
15835 Corporate Road North  
Jupiter, Florida 33478

Dear Mr. Biegun:

The staff of the Federal Trade Commission ("FTC") has received your submissions of April 19, 2012 and May 16, 2012, on behalf of Seatbelt Solutions. In our correspondence and discussions, you indicated that although Seatbelt Solutions' 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 Seatbelt Solutions 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 be "Laura Koss", written over a horizontal line.

Laura Koss  
Staff Attorney