

Bureau of Consumer Protection

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

May 29, 2012

## FEDERAL EXPRESS

Gary Vogl President SeatBeltsPlus.com 1338 Rocky Point Drive Oceanside, California 92056

Dear Mr. Vogl:

The staff of the Federal Trade Commission ("FTC") has received your submissions of April 17, 2012, April 28, 2012, and May 18, 2012, on behalf of SeatBeltsPlus.com. In our correspondence and discussions, you indicated that although SeatBeltPlus.com's products have more than *de minimis* foreign content, the company based its unqualified "Made in USA" claims for these products upon the fact that they are assembled, sewn, and packaged in the United States. In light of guidance provided by Commission staff, however, you now indicate that SeatbeltsPlus.com 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,

Laura Koss

Staff Attorney