



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

Bureau of Consumer Protection
Division of Enforcement

Julia Solomon Ensor
Attorney

Email: jensor@ftc.gov
Direct Dial: (202) 326-2377

August 1, 2013

FEDERAL EXPRESS

Wendelynne J. Newton, Esq.
Buchanan Ingersoll & Rooney PC
One Oxford Centre- 20th Fl.
301 Grant Street
Pittsburgh, PA 15219

Dear Ms. Newton:

We received your submissions dated May 31, June 12, and July 16, 2013, on behalf of All-Clad Metalcrafters, LLC ("All-Clad" or the "Company"). Through correspondence and discussions, we outlined concerns that although All-Clad's website stated that the Company makes some, but not all, of its products in the USA, some consumers could be misled into thinking that all of All-Clad's products are made in the USA. You explained that All-Clad would correct misperceptions by being more specific about which products were made in the USA on the Company's website, and by more proactively communicating with All-Clad's retailers.

In your submissions, you stated that All-Clad implemented a remedial action plan to clarify its representations. This plan included: (1) adding more specific country-of-origin statements to All-Clad's website; (2) communicating with customers and retailers about All-Clad's domestic and foreign manufacturing activity; (3) revising brochures to clarify USA-origin claims; and (4) scheduling periodic reviews of retailer websites to monitor the accuracy of any USA-origin claim for All-Clad products.

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, you can reach me at (202) 326-2377.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Ensor".

Julia Solomon Ensor, Staff Attorney