



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

Bureau of Consumer Protection
Division of Enforcement

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December 17, 2013

FEDERAL EXPRESS

Mr. Scott Eliot, President
Action Coupling & Equipment, Inc.
8248 County Rd. 245
Holmesville, OH 44633

Dear Mr. Eliot:

We received your submissions on behalf of Action Coupling & Equipment, Inc. ("Action Coupling" or the "Company"). In subsequent correspondence and discussions, we identified broad statements in Action Coupling's marketing materials that could inadvertently mislead consumers about the extent to which the Company's products are made in the United States. Specifically, although Action Coupling makes the majority of its products in the United States, some products are imported, and others contain imported components such as copper expansion rings and ball bearings.

After receiving Commission staff's letter, you explained that Action Coupling implemented a remedial action plan to correct its representations. This plan included revising and adding qualifications to Action Coupling's marketing materials, and introducing a new protocol for substantiating U.S.-origin claims.

Based on the Company's 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, 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. Solomon Ensor".

Julia Solomon Ensor
Staff Attorney