



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

Bureau of Consumer Protection
Division of Enforcement

Julia Solomon Ensor
Attorney

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January 27, 2014

FEDERAL EXPRESS

Cheryl A. Falvey, Esq.
Crowell & Moring LLP
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Dear Ms. Falvey:

We received your submissions dated December 30, 2013, and January 21, 2014 on behalf of your client, Rapiscan Systems ("Rapiscan"). In correspondence and discussions, you explained that Rapiscan inadvertently made misleading "Made in USA" claims on approximately 791 units that contained parts manufactured in other countries.

In your submissions, you explained that, after identifying this issue, Rapiscan moved quickly to correct its claims, implementing a comprehensive remedial action plan. This included: (1) providing comprehensive training to employees; (2) notifying affected customers; (3) implementing a process to permanently remove any potentially deceptive U.S.-origin claims; (4) incorporating new labels without U.S.-origin claims into the assembly line; and (5) introducing a product label review process.

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, 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