



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

Division of Enforcement
Bureau of Consumer Protection

May 8, 2012

FEDERAL EXPRESS

Mr. Anthony A. Paolo
VP Corporate Quality
Summer Infant, Inc.
Woonsocket, Rhode Island 02895

Dear Mr. Paolo:

The staff of the Federal Trade Commission ("FTC") has received your submission of April 5, 2012 on behalf of Summer Infant, Inc. ("Summer Infant"). In your letter, you stated that certain of Summer Infant's retailers' websites advertised Summer Infant bibs as "Made in the United States," when, in fact, some of the bibs were imported from China. According to your letter, since approximately December 2010, Summer Infant has sourced the bibs in both the United States and China. Your letter further explained that, although some bibs incorrectly were advertised as "Made in USA" online, the bibs themselves and their packaging have accurately reflected their country of origin (either USA or China). Your letter also advised us that Summer Infant has contacted its retail partners to notify them of the error and has assisted them with making necessary changes to their websites. Further, in a subsequent email, you confirmed that Summer Infant has reviewed its website to ensure all "Made in USA" claims are accurate. Finally, you assert that Summer Infant is developing an "Internal Work Instruction/Procedure" to periodically audit retailer websites to ensure compliance with the FTC law.

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 read "L. Koss", with a long horizontal flourish extending to the right.

Laura Koss
Staff Attorney