

FEDERAL TRADE COMMISSION DECISIONS

Findings, Opinions and Orders

IN THE MATTER OF

TRISTATE HOUSEHOLD GOODS TARIFF CONFERENCE, INC.

DISMISSAL ORDER IN REGARD TO ALLEGED VIOLATION OF SEC. 5 OF THE  
FEDERAL TRADE COMMISSION ACT

*Docket 9184. Complaint, Sept. 18, 1984—Order Dismissing Complaint, July 5, 1985*

The Federal Trade Commission has dismissed the complaint in this matter since the collective ratemaking activities of respondent are immunized by the state action doctrine. The Commission has found that "further prosecution of this matter does not appear to be in the public interest."

COMPLAINT

Pursuant to the provisions of the Federal Trade Commission Act, and by virtue of the authority vested in it by said Act, the Federal Trade Commission, having reason to believe that Tristate Household Goods Tariff Conference, Inc., a corporation, hereinafter sometimes referred to as "respondent," has violated the provisions of said Act, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, hereby issues its complaint stating its charges as follows:

For the purposes of this complaint the use of the present tense includes the past tense and the following definitions apply:

*Carrier* means a common carrier of property by motor vehicle.

*Intrastate transportation* means the pickup or receipt, transportation and delivery of property for compensation wholly within any State of the United States by a carrier authorized by that State to engage therein.

*Tariff* means a publication and any supplements thereto stating the rates of a carrier for the intrastate transportation of property, excluding general rules and regulations.

*Member* means any carrier or other person that pays dues or belongs to Tristate Household Goods Tariff Conference, Inc. or to any successor corporation.

*Rate* means a charge, payment or fixed price according to a ratio, scale or standard for direct or indirect transportation service.

*Collective rate* means any rate or charge established under any contract, agreement, understanding, plan, program, combination or conspiracy between two or more competing carriers, or between any carrier and respondent.

PARAGRAPH 1. Respondent, Tristate Household Goods Tariff Conference, Inc., is a corporation organized, existing and doing business under and by virtue of the laws of Delaware, with its office and principal place of business located at 410 N. Governor Printz Boulevard, PA Route 291, Lester, Pennsylvania. Respondent publishes and issues tariffs containing rates for the intrastate transportation of property on behalf of its member carriers.

PAR. 2. Carriers engaging in intrastate transportation of property within Pennsylvania do so under certificates of public convenience and necessity granted by the Pennsylvania Public Utilities Commission. Such carriers are subject to rate regulation by the said Commission and are required to charge just and reasonable rates. Carriers in Pennsylvania are required to charge the rates filed once they have been accepted by the said Commission.

PAR. 3. The statute which provides for regulation of carriers engaged in the intrastate transportation of property within Pennsylvania does not compel, command, authorize or otherwise provide for the establishment, operation or continuation of collective rates among carriers or others on their behalf.

PAR. 4. Except to the extent that competition has been restrained as herein alleged, respondent's members are now in competition among themselves and with other carriers.

PAR. 5. Respondent's membership consists of approximately 450 carriers engaging in intrastate transportation of property within Pennsylvania. Respondent's members are entitled to and do, among other things, vote for and elect the officers and directors of respondent. The control, direction and management of respondent are vested in the Board of Directors, which employs a general manager who acts as chief administrative officer of the corporation with direct charge of and supervision over the affairs of the corporation.

PAR. 6. The acts and practices of respondent set forth in Paragraph Eight are in or affecting commerce as "commerce" is defined in the Federal Trade Commission Act, as amended, and respondent is subject to the jurisdiction of the Federal Trade Commission. Respondent's acts and practices:

from businesses and other private parties to respondent's members for rendering intrastate transportation services;

(B) Affect respondent's members' purchase and use of equipment and other goods and services which are shipped across state lines; and

(C) Are supported by the receipt of dues and fees which are sent across state lines.

PAR. 7. Shippers use the intrastate services of respondent's members to transport property from warehouses and distribution centers in Pennsylvania to customers in Pennsylvania, which property was originally shipped into Pennsylvania from other states. For such intrastate deliveries of property from warehouses and distribution centers, carriers charge shippers or shippers' customers the intrastate rates published by respondent. These intrastate shipping charges are factors which influence the prices of such property. The intrastate delivery services of these carriers are an essential and integral part of the interstate business transactions of such shippers. Thus, the activities of these carriers have a substantial and direct effect upon interstate commerce.

PAR. 8. Respondent, its members, officers, directors, and others are engaging in a combination, conspiracy, agreement, concerted action or unfair and unlawful acts, policies and practices, the purpose or effect of which is to unlawfully hinder, restrain, restrict, suppress or eliminate competition among carriers engaged in the intrastate transportation of property within Pennsylvania.

Pursuant to and in furtherance thereof, respondent, its members and others engage in the following acts, policies and practices, among others:

(A) Initiating, preparing, developing, disseminating, and taking other actions to establish and maintain collective rates for the intrastate transportation of property within Pennsylvania;

(B) Participating in the collective rates; and

(C) Filing collective rates with the Pennsylvania Public Utilities Commission.

PAR. 9. The acts and practices of respondent, its members and others as alleged in Paragraph Eight have the effect of:

(A) Fixing, stabilizing, raising, maintaining, or otherwise interfering or tampering with the rates charged by carriers for the intrastate transportation of property within Pennsylvania;

(B) Restricting, restraining, hindering, preventing or frustrating rate competition among carriers for the intrastate transportation of property within Pennsylvania;

(C) Depriving shippers patronizing carriers for intrastate transpor-

tation of property within Pennsylvania of the benefits of free and open competition in the provision of said services; and

(D) Depriving consumers in Pennsylvania of the benefits of free and open competition in the intrastate transportation of property.

PAR. 10. The acts, policies and practices of respondent, its members and others, as herein alleged, are all to the prejudice and injury of the public and constitute unfair methods of competition in or affecting commerce in violation of Section 5 of the Federal Trade Commission Act, as amended. The acts and practices of respondent, as herein alleged, are continuing and will continue in the absence of the relief herein requested.

#### ORDER DISMISSING COMPLAINT

The Commission has considered this matter on complaint counsel's unopposed motion that the complaint be withdrawn.

In this case respondent has argued that its collective ratemaking activities are immunized by the state action doctrine. Complaint counsel now represents that all the elements of a state action defense as articulated by the Supreme Court in *Southern Motor Carriers Rate Conference v. United States*, 105 S.Ct. 1721 (1985), are available to the respondent. Accordingly, further prosecution of this matter does not appear to be in the public interest. The complaint is therefore dismissed.

## Complaint

IN THE MATTER OF  
ASSOCIATED MILLS, INC.

CONSENT ORDER, ETC., IN REGARD TO ALLEGED VIOLATION OF SEC. 5 OF  
THE FEDERAL TRADE COMMISSION ACT

*Docket 9169. Complaint, Oct. 24, 1983—Decision, July 23, 1985*

This consent order requires the Chicago, Ill. manufacturer and seller of the Pollenex Pure Air "99" Air Cleaner/Deodorizer Model 699, among other things, to cease representing, contrary to fact, that this portable household air cleaning appliance removes most tobacco smoke and substantially all ragweed pollen and dust from the air people breathe under household conditions and that the appliance effectively filters all the air in a 14 foot × 18 foot room in less than an hour. The order also bars the firm from misrepresenting the ability of any such appliance or equipment to clean or remove any quantity of indoor air contaminants, or the conditions of use under which the appliance would remove the contaminants. Further, the company is required to possess competent and reliable evidence to support any claim relating to the performance characteristics of such appliance; and maintain written records of all materials that substantiate, contradict, or qualify performance claims.

*Appearances*

For the Commission: *Judith Wilkenfeld, Elizabeth Toni Guarino and Reid Horowitz.*

For the respondents: *Robert L. Wald and Mark Schattner, Wald, Harkrader & Ross, Washington, D.C.*

COMPLAINT

Pursuant to the provisions of the Federal Trade Commission Act, as amended, and by virtue of the authority vested in it by said Act, the Federal Trade Commission, having reason to believe that Associated Mills, Inc., hereinafter referred to as respondent, has violated the provisions of said Act, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, hereby issues its complaint stating its charges in that respect as follows:

PARAGRAPH 1. Respondent is a corporation organized, existing and doing business under and by virtue of the laws of the State of Illinois, with its office and principal place of business located at 111 N. Canal Street, Chicago, Illinois.

PAR. 2. Respondent is now, and at all times relevant to this com-

plaint has been, engaged in the manufacture and sale of a portable, electric household air cleaning appliance, the Pollenex Pure Air "99" Air Cleaner/Deodorizer Model 699 (hereinafter referred to in the complaint as "air cleaning appliance"), and other products to the public.

PAR. 3. Respondent operates in various States of the United States and in the District of Columbia. Respondent's manufacture, sale and distribution of air cleaning appliances mentioned herein constitutes maintenance of a substantial course of trade in or affecting commerce, as "commerce" is defined in the Federal Trade Commission Act.

PAR. 4. Respondent at all times mentioned herein has been and now is in competition with individuals, firms and corporations engaged in the sale of household air cleaning appliances and other products.

PAR. 5. In the course and conduct of its business, and for the purpose of promoting the sale and distribution of household air cleaning appliances, respondent has disseminated and caused the dissemination of advertising for household air cleaning appliances in national magazines, newspapers and catalogs distributed by the mail and across state lines. Respondent has also placed air cleaning appliance advertisements with television stations having sufficient power to broadcast across state lines and into the District of Columbia. In addition, respondent has distributed by mail or other means, product brochures and other sales literature directly to consumers or to dealers for display or distribution to consumers prior to or at the time of sale.

PAR. 6. Typical statements and representations in said advertisements and promotional materials, disseminated as previously described, but not necessarily inclusive thereof, are found in advertisements and promotional materials attached hereto as Exhibits A, B, C, D, E, F and G.

PAR. 7. Through the use of the statements and representations referred to in Paragraph Six and other representations contained in advertisements and promotional materials not specifically set forth herein, respondent has represented, and now represents directly or by implication, the following claims:

- a. The air cleaning appliance eliminates tobacco smoke from the air people breathe under household living conditions.
- b. The air cleaning appliance cleans the air of or removes most tobacco smoke from the air people breathe under household living conditions.
- c. The air cleaning appliance "takes out 99% of ragweed pollen"

d. The air cleaning appliance removes 80% of the dust from the air people breathe under household living conditions.

e. One air cleaning appliance effectively filters all the air in a 14 foot  $\times$  18 foot room in approximately 25 minutes.

PAR. 8. In truth and in fact, the direct or implied representations set forth in Paragraph Seven are false, for reasons including but not limited to the following:

a. The air cleaning appliance does not eliminate, does not clean the air of and does not remove most tobacco smoke from the air people breathe under household living conditions. Independent tests, when extrapolated by generally accepted procedures to advertised room conditions, show that the air cleaning appliance optimally can remove no more than 12% of tobacco smoke from the indoor air people breathe.

b. Respondent's tests and independent tests, when extrapolated by generally accepted procedures to advertised room conditions, show that the air cleaning appliance cannot remove 99% of ragweed pollen or 80% of dust from the indoor air people breathe.

c. Independent tests show that the air cleaning appliance cannot effectively filter all the air in a 14 foot  $\times$  18 foot room in approximately 25 minutes or in less than an hour.

Therefore, the direct or implied representations set forth in Paragraph Seven are false and misleading.

PAR. 9. Through the use of the advertisements and promotional materials referred to in Paragraph Six and other advertisements and promotional materials not specifically set forth herein, respondent has represented, directly or by implication, that it possessed and relied upon a reasonable basis for the representations set forth in Paragraph Seven at the initial dissemination of the representations and each subsequent dissemination. In truth and in fact, respondent did not possess and rely upon a reasonable basis for making such representations because, *inter alia*, respondent either did not conduct appropriate tests or did not properly extrapolate test results by generally accepted procedures to advertised room conditions. Therefore, respondent's representations are false and misleading.

PAR. 10. The use by respondent of the aforesaid false and misleading representations, and the placement in the hands of others of the means and instrumentalities by and through which others may use the aforesaid statements and representations, have had the capacity and tendency to mislead consumers into the erroneous and mistaken belief that said representations are true and complete and to induce such persons to purchase air cleaning appliances sold by respondent by reason of said erroneous and mistaken belief.

PAR. 11. The aforesaid acts and practices of respondent, as herein alleged, were and are all to the prejudice and injury of the public and of respondent's competitors, and constituted and now constitute unfair and deceptive acts or practices in or affecting commerce and unfair methods of competition in violation of Section 5 of the Federal Trade Commission Act, as amended.



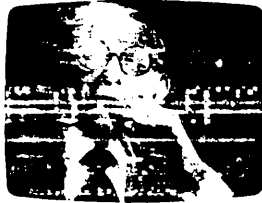
Complaint

EXHIBIT A



ASSOCIATED MILLS INC.

COMPANY: Associated Mills, Inc.  
PRODUCT: Pollenex Pure Air "99"  
COMMERCIAL TITLE: "George Burns 699 Pollenex"  
COMMERCIAL NO.: YAPP0056  
LENGTH: 2:35



WHEN I SMOKE CIGARS AT HOME MY FRIENDS NEVER OBJECT.



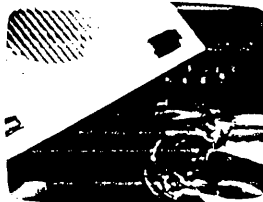
BECAUSE I'VE GOT A POLLENEX PURE AIR "99".



SMOKE GRABBER 6 STAGE FILTER WITH ACTIVATED CHARCOAL.



IT REMOVES SMOKE, POLLEN AND DUST... EVERYTHING BUT YOUR RELATIVES!



SMOKE GOES IN HERE...



CLEAN AIR COMES OUT HERE.



AND IT'S EXTRA LARGE FILTER TAKES OUT 99% OF RAGWEED POLLEN.



THESE ARE MY FRIENDS. THEY'RE CRAZY ABOUT MY PURE AIR "99" FROM POLLENEX.



(LOCAL DEALER TAG)

Complaint

106 F.T.C.

## EXHIBIT B

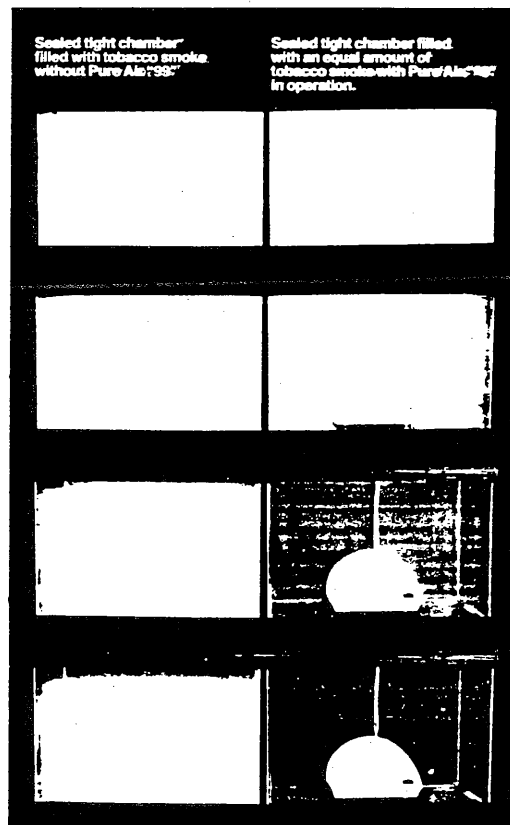
  
 Air Cleaner/Deodorizer

## Clears the air of smoke in minutes. Lab tests prove it!

- Tests showed that in a matter of minutes approximately 85% of the tobacco smoke in the chamber containing Pure Air "99"™ had dissipated.
- Filter material proven in tests over 30 years on purifiers retailing up to \$400.
- **Electrostatic dust and dirt trap.** Air passing through this basic filter material, consisting of thousands of interconnecting fibers, creates a highly effective natural electrostatic charge that captures and holds dust and dirt.
- Filter proven to remove dust, pollen and other impurities from the air.
- Activated charcoal proven to remove smoke and other household odors.
- Bigger filter capacity than major competitors.
- Long-lasting lemon-lime fragrance proven to freshen air.
- Use on table, counter or mount on wall.
- Two speeds of air re-circulation.
- Backed by Pollenex' name and \$3,000,000 Network Prime Time TV.
- Local TV, in top markets (over 300 GRPs per market).
- Network TV, game shows.



Watch for  
George Burns  
as TV  
spokesperson  
for Pure Air "99"™  
starting Sept. 1.



#1 Pollenex  
No. 1 in health care  
appliances.

See us at the Hardware Show, Booths ME-1002, ME-1101

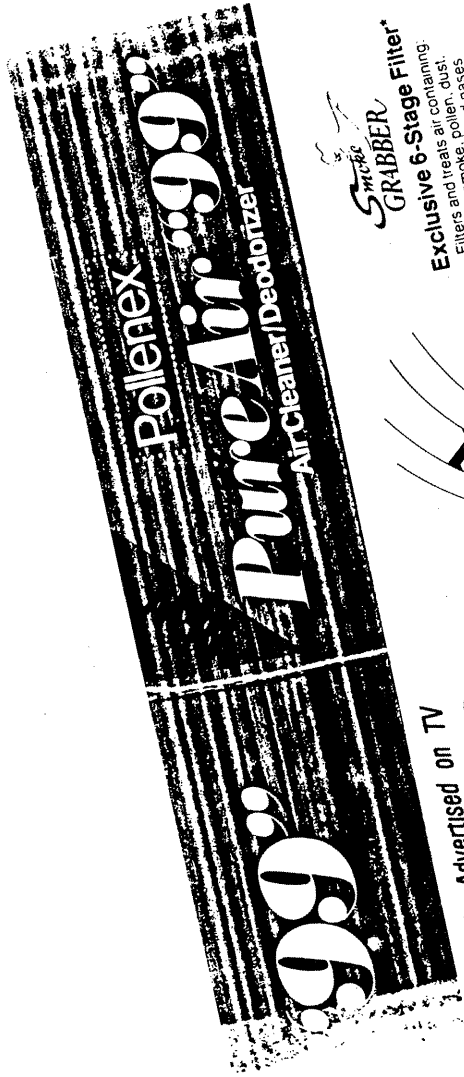
**PURE AIR '99' with the proven filter**



ASSOCIATED MILLS, INC.

Complaint

EXHIBIT C

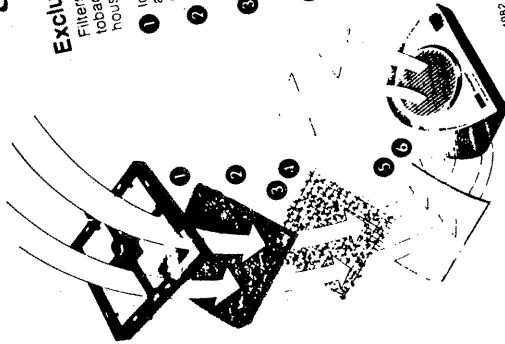


AS Advertised on TV



"IT REMOVES SMOKE, POLLEN  
 AND DUST - EVERYTHING BUT  
 YOUR RELATIVES!"

- SMIRK GRABBER**
- "6-Stage" Filter with Activated Charcoal
  - More powerful
  - Larger filter
  - Quiet setting for sleeping



**SMIRK GRABBER**

**Exclusive 6-Stage Filter\***

Filters and treats air containing:

tobacco smoke, pollen, dust, household odors and gases

1 Impingement fibers intercept larger airborne particles of pollen, dust and dirt.

2 Fibers are impregnated with a unique coating that holds particles in the filter material.

3 **ACTIVATED CHARCOAL** absorbs household gases and odors from tobacco smoke, cooking and other sources.

4 **ABSORBEAD**® Crystals attract even more smoke and other odors.

5 Final Filter removes smoke and air-borne pollutants.

6 Special coating on final filter provides electrostatic action that holds captured minute smoke and other particles.

\*Recommended for rooms approximately 18' x 14' x 8'

© 1982 Associated Mills, Inc. 111 N. Canal St. Chicago, IL 60606

1987 PENDING

Complaint

106 F.T.C.

EXHIBIT D

Pollenex<sup>TM</sup>  
**Pure Air '99**  
**Air Cleaner/  
 Deodorizer**  
 With Fragrance Control  
 Model 699

**INSTRUCTIONS  
 AND  
 WARRANTY**

© 1991 Associated Mills, Inc.



**LIMITED WARRANTY**

The product listed is warranted to be free from defects in material and workmanship under normal use and service for a period of 90 days from date of sale to consumer. The manufacturer's obligation shall be limited to repairing or replacing F.O.B. Chicago, Ill. 60606, any part of the product which is defective. Such warranty shall not apply to defects resulting from accidents, abuse or misuse if you must return the product for reasons of malfunction, the following action and steps are required:

- a. Package the product securely to protect from damage or breakage in shipment.
- b. Ship prepaid to Associated Mills by most convenient method.

This warranty gives you specific legal rights and you may also have other rights which vary from state to state. Return of owner registration card is not a condition precedent to warranty coverage.

**ASSOCIATED MILLS, INC.**  
 111 N. Canal, Chicago, IL 60606

ASSOCIATED MILLS, INC.  
 111 N CANAL  
 CHICAGO, IL 60606

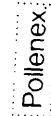
POSTCARD

PLACE  
STAMP  
HERE

Complaint

5

**Pure Air '99™ Air Cleaner Deodorizer**  
**OWNER REGISTRATION CARD**  
 COMPLETE AND MAIL WITHIN 90 DAYS.



Model 699 Other

NAME \_\_\_\_\_  
 ADDRESS \_\_\_\_\_  
 CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_  
 PHONE \_\_\_\_\_  
 MODEL NO. \_\_\_\_\_  
 SERIAL NO. \_\_\_\_\_  
 PURCHASE DATE \_\_\_\_\_  
 PURCHASE PRICE \_\_\_\_\_  
 SALES TAX \_\_\_\_\_  
 TOTAL PRICE \_\_\_\_\_

21. Please Check **1** Purchaser/Co purchaser  
**2** Gift Recipient  
**3** Type in purchaser's neighborhood  
**4** Person other than above completing card  
**5** In purchaser's neighborhood

22. Your Age **23** You Sex **24** Who primarily decided to buy?  
**1** Under 21 **1** Male **1** Myself  
**2** 21-30 **2** Female **2** Myself  
**3** 31-40 **3** Male **3** Myself  
**4** 41-50 **4** Female **4** Myself  
**5** 51-60 **5** Male **5** Myself

**25** Marital Status **26** Who will use?  
**1** Married **1** Self only **3** Self and other  
**2** Single **2** Other **4** Self and other

**27** Purchase Recommended By  
**1** Dealer  
**2** Other

**28** Become interested in product through  
**1** Advertisement  
**2** Store Display  
**3** Sales Pitch  
**4** Other  
**5** Friend  
**6** Other

**43** For what MAIN Purpose was Product purchased? Check only one  
**A** Help alleviate allergy  
**B** Help alleviate asthma  
**C** Help eliminate pet odors  
**D** Help eliminate cigarette odors  
**E** Help eliminate cooking odors  
**F** Help eliminate household odors  
**G** Help eliminate car odors  
**H** Help eliminate other odors  
**I** Help eliminate other odors  
**J** Help eliminate other odors  
**K** Help eliminate other odors

**HOW TO GET THE MOST FROM YOUR POLLENEX™ PURE AIR '99™**  
 You'll enjoy fresher air continuously if you run the unit constantly. It's built for that kind of service. Works effectively in filtering about the same amount of air as would normally be contained in a room in approximately 25 minutes. That way you're recirculating, cleaning and deodorizing air every quarter of an hour or so, when your unit is set on high speed.

When you first turn on unit, if possible, shut doors and windows in the room. Let unit run on high speed in the closed room for about 30 minutes. That way you'll get an initial concentration of effort. Then you can open the doors, and the unit will continue working effectively.

**HOW TO USE THE EXCLUSIVE FRAGRANCE CONTROL**  
 Fragrance beads and their control are located in the center of the frame covering Stage 1 of the filter. Dial OFF for no scent, HI for a light citrus scent, or LO for a light citrus scent.

**WHAT ABOUT THE POLLENEX™ STAGE 4™ FILTER?**  
**HOW LONG DOES IT LAST?**  
**IMPORTANT:** If you choose to enjoy the light citrus fragrance you will notice that it will gradually diminish. Effectiveness of filter is not diminished by absence of the odor and is designed to have a long life. If the unit runs constantly, the filter will need replacement only once every two to three months.

Replacement filters are available at your Pollenex™ Pure Air '99™ dealer. If he is temporarily out of stock, write Associated Mills/Pollenex™, 111 N. Canal St., Chicago, IL 60606 for the name of another nearby dealer.

**HOW TO CARE FOR YOUR POLLENEX™ PURE AIR '99™**  
 This unit needs no lubrication. It is engineered to give long useful service with a minimum of care. The exterior housing is made of high impact plastic. To remove dust or fingerprints, just use mild soap on a wet cloth. Use a dry cloth to wipe off excess water. Do not use harsh industrial detergents.

**CAUTION:** Be sure to unplug unit before cleaning. Do not immerse unit in water. It will cause permanent damage to unit and could be very dangerous to you.

Associated Mills Inc. • 111 N. Canal Street • Chicago, IL 60606

**HOW YOUR POLLENEX™ PURE AIR '99™ MODEL 699 WORKS**  
 You have purchased one of the latest air filtration systems for the home or office.  
 Your Model 699 Pure Air '99™ air cleaner and deodorizer has a specially designed unit that forces air through the unique Pollenex™ Stage 4™ filter that helps clean and deodorize air polluted with pollen, dirt, and odors to smoke.



- EXCLUSIVE "STAGE 4™" FILTERING SYSTEM**
1. Unique Pollenex™ filtering material, written up in medical journals and proven in use for over 30 years. A natural electrostatic dust and dirt trap.
  2. ACTIVATED CHARCOAL to remove smoke and other odors.
  3. ARSORBEBADS™ to trap trap dust and lint.
  4. Final filter for final air check.

**HOW TO OPERATE YOUR POLLENEX™ PURE AIR '99™**  
 Snap out filter on base of unit and remove from plastic wrap. Re-install filter with side latch top. Snap back in place. Do not have unit connected to electrical outlet while you are removing or replacing filter. Have switch in "off" position. To operate plug cord into electric outlet. Turn switch to either HI or LOW speed and your unit is in operation. Unit operates from 110 to 120 volts AC, 60Hz.

**WHERE TO USE YOUR POLLENEX™ PURE AIR '99™**  
 Use it anywhere in the home or office, where you'd like to enjoy fresher air: kitchen, bath, bedroom, living room, dining room, powder room, pet areas, sick room, or private office conference room, reception area.

FEDERAL TRADE COMMISSION DECISIONS  
Complaint

EXHIBIT E

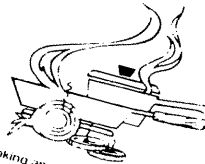
106 F.T.C.

For people who care about the air they breathe!



Over 35 million people are bothered by pollen in the air.

Millions of people in millions of homes and offices would love to breathe fresher air instead of air contaminated with irritating pollutants like pollen and dust, tobacco smoke, cooking and other household odors.



Cooking and other household odors are most obvious.



Dust is a common household problem.



Over 75% of all adults don't smoke. Many find breathing in smoke offensive.

Pollenex

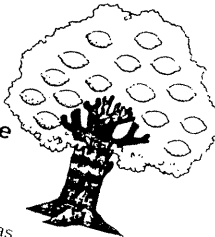
# Pure Air "99"

AIR CLEANER & DEODORIZER



Model 699  
2 Speeds

Helps keep air fresh and fragrant. Like having a lemon-lime tree in your room.



Leaves behind a light lemon-lime fragrance as it recirculates air in the room.

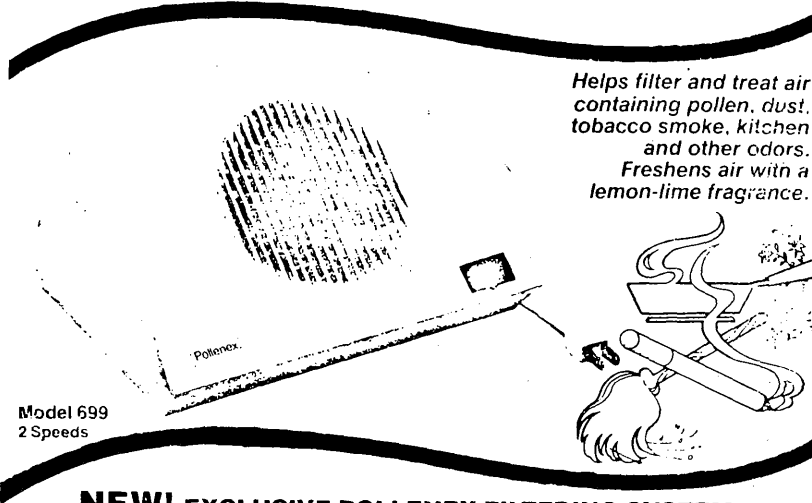
Pollenex—The name that stands for air filtering for 30 years.

Complaint

**NEW** Pollenex

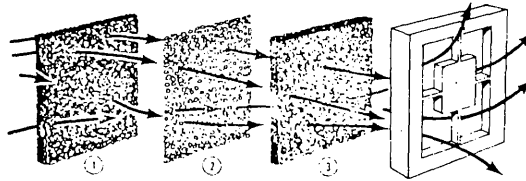
# Pure Air "99"

**AIR CLEANER & DEODORIZER**



*Helps filter and treat air containing pollen, dust, tobacco smoke, kitchen and other odors. Freshens air with a lemon-lime fragrance.*

## **NEW! EXCLUSIVE POLLENEX FILTERING SYSTEM**



**AIR IS RECIRCULATED THROUGH** Exclusive Pollenex filter with activated charcoal for air cleaning and deodorizing. Filter material proven in tests over 30 years on Pollenex air filters. Crystal particles saturated with a lemon-lime fragrance to freshen air. Final filter before air is recirculated to room.

The Pollenex filtering system is designed to remove pollen, dust, tobacco smoke, kitchen and other odors from the air. It also freshens the air with a lemon-lime fragrance.

EXHIBIT F

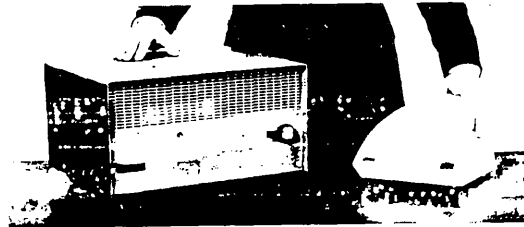
POLLENEX.....PROFIT EDITION

**Booming Sales Predicted for Indoor Air Cleaner**

**Over 102,000,000 Americans are Bothered by tobacco smoke**

The trend toward non smokers has been increasing rapidly over recent years. Moreover, those who find being subjected to tobacco smoke offensive, are increasing substantially in number.

The Pure Air "99" is ideal for homes and offices that are subjected to tobacco smokers and where treatment of air containing tobacco smoke is desirable for a variety of reasons.



**Pollenex® has over 30 years experience in Air Filtering Systems**

Pollenex® has been a pioneer in the field of indoor air filtering, for more than three decades. The basic Pollenex® filtering material has been tested in use in air filtering machines re-

taining for as much as \$400.00. The Pollenex® Pure Air "99" Model 999, is the culmination of all that testing, plus modern technology and advances in the engineering of air cleaning and deodorizing systems. You can't find a more advanced design piece of equipment for the money.

**New way to deal with household odors without chemical sprays**

Homes collect odors like they collect dust. Chemical sprays that mask them are not only expensive but not the most desirable way to eliminate odors.

With homes tightly sealed today, to save energy costs, cooking odors, bathroom odors, pet odors, tobacco odors and all kinds of household odors are offensive and embarrassing.

New Pure Air "99" helps fight odors, as it filters air with the unique Pollenex® "Stage 1" Filtering System. As it recirculates and helps clean and deodorize air, it leaves behind a refreshing lemon-lime fragrance.

**Over 23,000,000 people are bothered by Pollen in the air**

The new Pure Air "99" helps filter out pollen. Independent Laboratory Testing shows over 90% effectiveness of removal of Giant Ragweed Pollen in air that passes through the Pollenex® filter.

Moreover, the Pollenex® filter in independent tests shows 80% effectiveness in removing fine dust particles that pass through the filter.

Those who care about the air they breathe, will find life pleasant in an environment of fresher, cleaner air. Pure Air "99" is a product the whole family will appreciate.



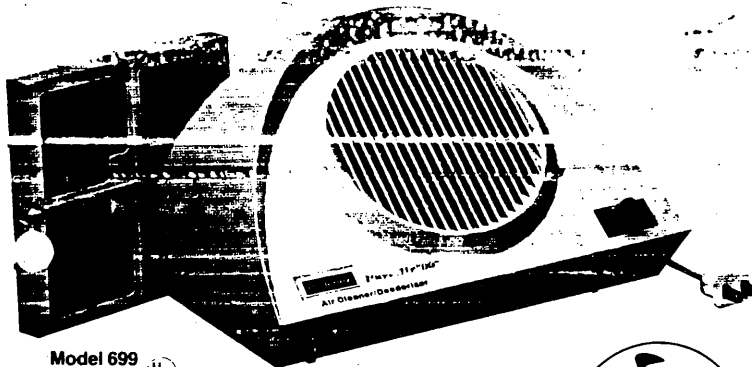
Remember that the allergens are those that can be borne by the wind currents, in addition to the way other factors contribute to a person's response as an allergen. One of the ability of a common ragweed pollen is to produce pollen in large quantities, such as 100,000. A single plant of ragweed has been estimated to produce 1,000,000 plants of pollen a day.

Pollenex **Pure Air "99"**™  
Air Cleaner/Deodorizer



Complaint

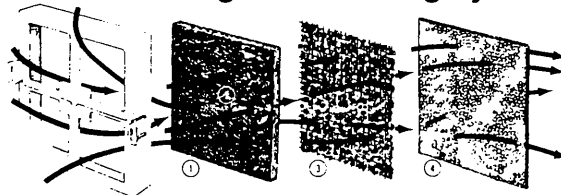
Pollenex  
**Pure Air "99"**™  
 Air Cleaner/Deodorizer



Model 699  
 2 Speeds 



**NEW!**  
 Exclusive "Stage 4"™ Filtering System



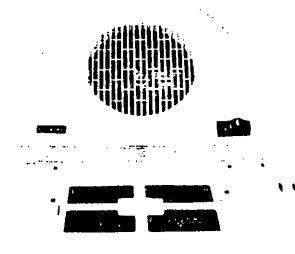
- ① Exclusive Pollenex® filtering material.
- ② Treated with activated charcoal.
- ③ PA99™ crystals saturated with lemon-lime fragrance.
- ④ Final filter for final air check.

A specially designed fan forces air through a 4-way air filtration system, helps clean and deodorize air polluted with pollen, dust, tobacco smoke, cooking odors, pet odors and other pollutants. Filters about the same amount of air as would normally be contained in a room 12' X 9' in approximately 15 minutes and it leaves behind a light lemon-lime fragrance.

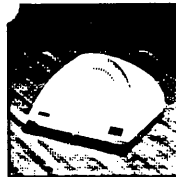
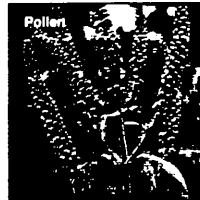
Pollenex

# Pure Air "99"

Air Cleaner/Deodorizer



Filters and treats air containing:



Use on counter or table



Hang on wall

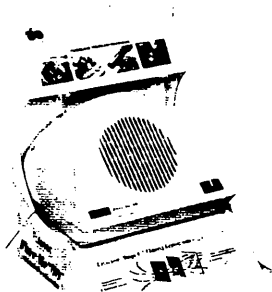


Enjoy all the benefits of fresher air in any room.

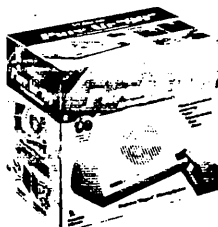


Complaint

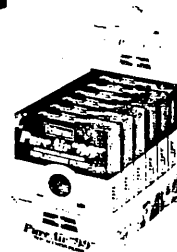
**Pollenex® gives you the product, the package, and all the point-of-sale material you need to build a big booming business.**



**Dynamic Counter Display**  
Compact, contemporary design. Made of durable plastic. Motivating selling message. Can be used with unit connected or disconnected.



**Dynamic Packaging**  
4-color graphics with full explanation of product, its features and benefits and where it can be used.



**Replacement Filter Display**  
For continuous plus sales. Filters need replacing every two to three months.

**PRIME TIME NETWORK T.V. AND MORE!**  
The biggest advertising program ever put behind an air cleaner/deodorizer.



**Network T.V.**  
\$10 million dollars in network television advertising on a select group of top T.V. shows for Fall 1981.

**Network Game Shows**  
Targeted to the best potential market for air cleaners.

**Local Market Spot T.V.**  
High impact, memorable spots with local dealer names in hundreds of T.V. markets.

**Magazine Ads**  
Big space, highly informative, in-depth sell ads in top magazines, reaching the best potential customers.



- The New York Times
- Chicago Tribune
- Los Angeles Times
- Dallas Times Herald
- The Miami Herald

**National Publicity Programs**  
All over America, in all media, people will be hearing about the amazing new Pollenex® Pure Air '89™.

