



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Division of Advertising Practices

Mary K. Engle

March 5, 2013

Jeffrey S. Edelstein  
Manatt, Phelps & Phillips, LLP  
7 Times Square  
New York, NY 10036

Re: NAD Referral of Energizer (Schick Hydro Razor)

Dear Mr. Edelstein:

As you know, the staff of the Federal Trade Commission's Division of Advertising Practices has conducted an inquiry into certain advertising representations made by Energizer Personal Care ("Energizer") for its Schick Hydro Razor. The National Advertising Division of the Council of Better Business Bureaus ("NAD") referred this matter to us after a compliance proceeding concluded that Energizer failed to modify its advertising as recommended by NAD.

Upon review of the matter, we have determined not to take additional action at this time. Among the factors we considered are your client's representations that the company will modify the Hydro advertising, including by improving the prominence, placement, and duration of the "hydrates only during shaving" super-imposed copy (*i.e.*, "super") used in connection with water drenching imagery. The Commission reserves the right to take such further action as the public interest may require.

Very truly yours,

Mary Koelbel Engle  
Associate Director

cc: Angela Sijuwade, Energizer Personal Care  
Andrea C. Levine, National Advertising Division