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

Office of the Secretary

May 8, 2014

Mr. John Shaw
Chief Executive Officer
Natural Products Association
1773 T Street, NW
Washington, DC 20009

Re: *GeneLink, Inc. and foru™ International Corporation*
FTC File No. 112-3095 and Docket Nos. C-4456 and C-4457

Dear Mr. Shaw:

Thank you for your comment regarding the above-referenced matter. Your letter was placed on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34, and was given serious consideration by the Commission.

In your comment, you express two main concerns about the scope of the proposed Orders for respondents GeneLink, Inc. ("GeneLink") and foru™ International Corporation ("foru™"). First, you contend that "FTC should not require two RCTs [randomized human clinical trials] by independent researchers on an 'essentially equivalent product' to substantiate health- and disease-related claims . . . about safe foods and dietary supplements." Letter from John Shaw, Chief Executive Officer, Natural Products Association, to Commissioners of the Federal Trade Commission (Feb. 4, 2014) ("NPA Comment") at 2. To that point, you express concern that a "two-RCT requirement" may "prevent manufacturers from sharing truthful information with consumers," thereby raising First Amendment concerns. *Id.* at 3. Second, you contend that "if the FTC intends to depart from its traditional 'competent and reliable scientific evidence' standard, then new formal guidance is necessary." *Id.* at 5.

As indicated in the statements of the individual Commissioners, the concerns raised in your comment were among those considered by the Commission when determining the appropriate injunctive relief in this matter. Moreover, because the injunctive relief in the GeneLink and foru™ Orders do not depart from well-established Commission precedent of making a case-by-case factual determination regarding what constitutes competent and reliable scientific evidence for the advertising claims at issue, no new guidance is warranted.

After carefully considering your comment, the Commission has determined that the public interest is best served by issuing the Decision and Order in final form without modification. A copy of the final Decision and Order, and other relevant materials, are available from the Commission's website at http://www.ftc.gov.

It helps the Commission's analysis to hear from a variety of sources in its work, and we thank you again for your letter.

By direction of the Commission, Commissioner Ohlhausen dissenting and Commissioner McSweeny not participating.

Donald S. Clark
Secretary