



Office of the Secretary

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

July 6, 2016

Ms. Yadira Carrasquillo
State of California

*Re: In the Matter of The Erickson Marketing Group Inc., d/b/a Rocky Mountain Sunscreen
File No. 152 3268, Docket No. C-4583*

Dear Ms. Carrasquillo:

Thank you for your comment supporting the Federal Trade Commission's allegations in the above-entitled proceeding. The Commission has placed your comment on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and has given it serious consideration.

After reviewing your letter and the investigative record, the Commission has determined that the relief set forth in the proposed order is appropriate and sufficient to remedy the violations alleged in the proposed complaint, and it is in the public interest to issue the Decision and Order in final form. The final Decision and Order and other relevant materials are available on the Commission's website at www.ftc.gov/enforcement/cases-proceedings/152-3268/erickson-marketing-group-inc-matter. It helps the Commission's analysis to hear from a variety of sources. The Commission thanks you again for your comment.

By direction of the Commission.

Donald S. Clark
Secretary



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July 6, 2016

Mr. Angus E. Crane
Commonwealth of Virginia

Re: In the Matters of Trans-India Products, Inc., d/b/a ShiKai, File No. 152 3265, Docket No. C-4582; The Erickson Marketing Group, Inc. d/b/a Rocky Mountain Sunscreen, File No. 152 3268, Docket No. C-4583; ABS Consumer Products, LLC, d/b/a EDEN BodyWorks, File No. 152 3269, Docket No. C-4584; and Beyond Coastal, File No. 162 300, Docket No. C-4585

Dear Mr. Crane:

Thank you for your comment supporting the Federal Trade Commission's allegations and consent agreements in the above-entitled proceedings. The Commission has given it serious consideration.

After reviewing your letter and the investigative record, the Commission has determined that the relief set forth in the proposed orders is appropriate and sufficient to remedy the violations alleged in the proposed complaints, and it is in the public interest to issue the Decisions and Orders in final form. The final Decisions and Orders and other relevant materials are available on the Commission's website at www.ftc.gov/enforcement/cases-proceedings. It helps the Commission's analysis to hear from a variety of sources. The Commission thanks you again for your comment.

By direction of the Commission.

Donald S. Clark
Secretary



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July 6, 2016

Ms. Mia Hardwick
State of California

*Re: In the Matter of Trans-India Products, Inc., doing business as Shikai
File No. 152 3265, Docket No. C-4582*

Thank you for your comment on the Federal Trade Commission's consent agreement in the above-entitled proceeding. The Commission has placed your comment on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and has given it serious consideration.

In your comment, you state that products should not be represented as "natural" if they contain any amount of synthetic ingredients, and that the term must be reserved only for companies that provide complete transparency and proof of the natural chemical makeup of their products. Thus, your comment arguably implies that the consent agreement should prohibit the claim "natural" unless the product is "all natural" (*i.e.*, contains no synthetic ingredients).

The record does not support revising the order in this way. We do not have evidence that consumers necessarily interpret "natural" to mean "all natural" or no synthetic ingredients. Absent such evidence, we do not feel it would be appropriate in this case for us to presume that consumers have that understanding of the term "natural." However, the order protects consumers by prohibiting "natural" and other composition claims unless they are true and not misleading. For example, if an advertisement states that a product is "natural," and if reasonable consumers would interpret that advertisement as a whole to imply that the product is "all natural," this claim would violate the order unless it is true and not misleading.

After reviewing your letter and the investigative record, the Commission has determined that the relief set forth in the proposed order is appropriate and sufficient to remedy the violations alleged in the proposed complaint, and it is in the public interest to issue the Decision and Order in final form. The final Decision and Order and other relevant materials are available on the Commission's website at www.ftc.gov/enforcement/cases-proceedings/152-3265/trans-india-products-inc-matter. It helps the Commission's analysis to hear from a variety of sources. The Commission thanks you again for your comment.

By direction of the Commission.

Donald S. Clark
Secretary



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July 6, 2016

Ms. Shari Hills
State of California

Re: In the Matter of Beyond Coastal, File No. 162 3001, Docket No. C-4585

Dear Ms. Hills:

Thank you for your comment supporting the Federal Trade Commission's consent agreement in the above-entitled proceeding. The Commission has placed your comment on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and has given it serious consideration.

After reviewing your letter and the investigative record, the Commission has determined that the relief set forth in the proposed order is appropriate and sufficient to remedy the violations alleged in the proposed complaint, and it is in the public interest to issue the Decision and Order in final form. The final Decision and Order and other relevant materials are available on the Commission's website at www.ftc.gov/enforcement/cases-proceedings/162-3001/beyond-coastal-matter. It helps the Commission's analysis to hear from a variety of sources. The Commission thanks you again for your comment.

By direction of the Commission.

Donald S. Clark
Secretary