



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

Bureau of Consumer Protection
Division of Enforcement

Julia Solomon Ensor
Attorney

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March 4, 2014

FEDERAL EXPRESS

Cheryl A. Falvey, Esq.
Crowell & Moring LLP
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Dear Ms. Falvey:

We received your submission dated February 10, 2014 on behalf of your client, Spacelabs Healthcare ("Spacelabs"). In that submission, you stated that Spacelabs inadvertently made misleading "Made in USA" claims for approximately 14 medical device product families that contain imported content.

In your letter you further explained that, after identifying this issue, Spacelabs moved quickly to correct its claims, implementing a comprehensive remedial action plan. This plan included: (1) implementing regular training for employees on "Made in the USA" claims; (2) removing "Made in the USA" labels from affected products and accessories; and (3) enhancing compliance and quality controls to ensure all labels continue to meet applicable regulatory requirements.

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, 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, you can reach me at (202) 326-2377.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Ensor".

Julia Solomon Ensor
Staff Attorney