



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

Bureau of Consumer Protection  
Division of Enforcement

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**FEDERAL EXPRESS**

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Dear Ms. O'Brien:

We received your submissions dated September 15, 2014 and October 2, 2014, on behalf of your client, Attwood Corporation ("Attwood"). In correspondence and discussions, you explained that Attwood inadvertently made misleading "Made in USA" claims for certain MotorGuide Trolling Motors that contain significant imported content, but are designated as originating in the United States for export tariff purposes. Specifically, Attwood erroneously applied "Made in USA" labels to the shipping cartons for all such motors – instead of only for motors destined for export – without clarifying that the "USA" mark related to export duties.

In your submissions, you stated that Attwood implemented a remedial action plan to correct its representations and avoid future mislabeling. This plan included: (1) removing export designations from the standard pack labels of shipping cartons for MotorGuide Trolling Motors sold in the United States; and (2) training involved employees on the FTC's Enforcement Policy Statement on U.S.-Origin Claims.

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 blue ink, appearing to read "J. Ensor".

Julia Solomon Ensor  
Staff Attorney