



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

Bureau of Consumer Protection  
Division of Enforcement

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May 26, 2016

**FEDERAL EXPRESS**

Mr. Jason Harrison  
Vice President, Production and Sales  
J.W. Manufacturing Company  
411 N. Sherman St.  
Mineral Springs, AR 71851

Dear Mr. Harrison:

We received your submissions on behalf of J.W. Manufacturing Company ("J.W. Manufacturing"). During our review, we raised concerns that certain marketing materials may have overstated the extent to which J.W. Manufacturing's mops are made in the United States. Specifically, although the company makes many of its mops in the United States using United States materials, certain mop heads incorporate significant imported fibers.

As discussed, unqualified "Made in USA" claims on marketing materials likely suggest to consumers that all products advertised in those materials are "all or virtually all" made in the United States. Accordingly, to avoid deceiving consumers, you explained that J.W. Manufacturing is in the process of implementing a remedial action plan to clarify its representations. This plan includes: (1) updating the company's website to clarify that some mops incorporate imported fibers; (2) placing stickers that read "Made in USA with US and Foreign Materials" over unqualified claims on affected packaging; (3) ordering new packaging with qualified claims; and (4) contacting third-party distributors to provide updated claims and product descriptions.

Based on your actions and other factors, 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