



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

Bureau of Consumer Protection
Division of Enforcement

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June 3, 2016

FEDERAL EXPRESS

Dean DeLuccia, President
Framework Inc.
8 Audrey Place
Fairfield, NJ 07004

Dear Mr. DeLuccia:

We received your submissions on behalf of Framework Inc. ("Framework" or the "Company"). During our review, we raised concerns that certain marketing materials may have overstated the extent to which Framework's products are made in the United States. Specifically, although the Company sells certain hardware and other products that are made in the United States, it also sells other hardware products that include significant imported content.

As discussed, unqualified "Made in the 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 Framework implemented a remedial action plan to clarify its representations. This plan included: (1) removing unqualified "Made in America" claims from the Framework homepage; (2) removing misplaced claims from the Company's digital catalogue; (3) placing stickers that read "Made in USA of U.S. and foreign parts" over claims for affected products in the printed Framework catalogue until the Company develops and prints new catalogues; (4) providing updated information to distributors; and (5) revising tradeshow materials to specify that a "majority" of the Company's products are made in the United States.

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