



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

Bureau of Consumer Protection
Division of Enforcement

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November 14, 2016

VIA FEDEX

Chad E. Paulson, Esq.
Vice President, General Counsel & Secretary
Blount International
4909 SE International Way
Portland, OR 97222

Dear Mr. Paulson:

We received your submissions on behalf of Blount International (“Blount”). During our review, we discussed concerns that marketing materials may have overstated the extent to which Blount products, including certain attachments to tractors, excavators, loaders, and mowers sold under the “Woods” name, are made in the United States. Specifically, although Blount assembles finished goods in the United States, several of these products incorporate significant imported parts.

As discussed, unqualified “Made in USA” claims on company marketing materials likely suggest to customers 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 Blount implemented a corrective action plan. This plan includes: (1) removing unqualified “Made in USA” claims from online and printed marketing materials; (2) removing or covering affected product decals; (3) emailing Blount employees to explain new marketing claims; (4) emailing all dealers to provide updated materials; (5) meeting with external sales personnel to follow up; and (6) conducting a field inventory to verify claims on all products and marketing materials.

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", with a stylized flourish at the end.

Julia Solomon Ensor
Staff Attorney