



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

Bureau of Consumer Protection
Division of Enforcement

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December 13, 2016

VIA FEDEX

Ms. Cindy Patai
Mr. Mychael Margott
Window Design Group
771 Chambers Lane, Suite 330
Simi Valley, CA 93065

Dear Ms. Patai and Mr. Margott:

We received your submissions on behalf of Window Design Group (“WDG”). During our review, we raised concerns that marketing materials overstated the extent to which WDG’s window and shutter products are made in the United States. Specifically, although WDG offers some products that are assembled in the United States, WDG primarily sells imported products.

As we discussed, unqualified “Made in USA” claims on company marketing materials likely suggest to consumers that all products advertised in those materials are “all or virtually all” made in the United States. To avoid deceiving consumers, marketers should possess and rely upon a reasonable basis substantiating their U.S.-origin claims at the time they are made. In this case, you explained that WDG has now removed all “Made in USA” claims from its marketing materials, including web and hard copy materials. To the extent WDG customers express interest in U.S.-origin products, WDG has also revised sales scripts to clarify that it offers a limited number of products that are assembled 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