



United States of America  
FEDERAL TRADE COMMISSION  
Washington, DC 20580

Division of Advertising Practices

January 29, 2019

Laura Brett, Esq., Director  
National Advertising Division  
112 Madison Avenue, 3rd Floor  
New York, NY 10016

Re: Advertising for Cross Brands Manufacturing, LLC's Sea & Ski Sun Care Products

Dear Ms. Brett:

I am writing to follow up on the NAD's referral to the FTC of its inquiry into Cross Brands Manufacturing, LLC's ("Cross Brands") advertising claims that its Sea & Ski Sun sunscreens provide consumers with protection against infrared radiation, including that they provide "IR GUARD infrared protection." Your referral indicated that Cross Brands refused to comply with NAD's determination that the company lacked sufficient evidence to support its claims and NAD's recommendation that the claims be discontinued. Accordingly, you referred this matter to the FTC for our review.

We have been in contact with Cross Brands to discuss the challenged advertising claims. We understand that the company will modify its advertising to discontinue disseminating the challenged claims going forward. The company has redesigned its [www.seanski.com](http://www.seanski.com) website and removed all references to infrared or "IR" protection. The company will also cease printing any further product packaging bearing infrared protection claims.

Upon review of the matter, we have determined not to take additional FTC action at this time. The Commission reserves the right to take such further action as the public interest may require. The FTC fully supports the NAD's self-regulatory process, and we appreciate your referral and the opportunity to continue to assist in supporting the NAD.

Very truly yours,

Carolyn L. Hann  
Chief of Staff for Advertising Practices