



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Division of Advertising Practices

September 4, 2015

Andrea C. Levine, Esq.  
Senior Vice President, Director  
National Advertising Division  
112 Madison Avenue, 3<sup>rd</sup> Floor  
New York, NY 10016

Re: Wal-Mart Stores, Inc.'s "Raise in Pay" Commercial

Thank you for your July 20, 2015 letter referring the NAD's investigation of a Wal-Mart television commercial regarding Wal-Mart's initiatives to increase spending on higher pay, education, and training for employees, including an increase in the minimum starting wage. NAD was concerned that the advertisement implied that Wal-Mart had raised the wages of its employees from minimum wage to \$15 per hour; that the increased wages represented a living wage, allowing employees to earn enough to support themselves and/or their family; and that the increased wages allow its employees to "build a future." Because Wal-Mart declined to participate in the self-regulatory process, you referred this matter to the Federal Trade Commission for our review.

Upon review of this matter, we have determined not to take additional action at this time. In arriving at this conclusion, we considered a number of factors related to resource allocation and enforcement priorities, as well as the nature of any FTC Act violation and the type and severity of any consumer injury. The Commission reserves the right to take such further action as the public interest may require.

Very truly yours,

Mary K. Engle  
Associate Director for Advertising Practices