



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

Bureau of Consumer Protection  
Division of Enforcement

Julia Solomon Ensor  
Attorney

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July 15, 2016

**VIA FEDEX**

Alicia J. Batts, Esq.  
Squire Patton Boggs LLP  
2550 M Street, NW  
Washington, DC 20037

Dear Ms. Batts:

We received your submissions on behalf of your client, Wright Tool Company (“Wright Tool”). During our review, we discussed concerns that certain marketing materials may have overstated the extent to which products sold by Wright Tool are made in the United States. You explained that Wright Tool sells two lines of tools, Wright Tool-branded tools and tools sold as part of the “Cougar Pro” line. Although Wright Tool-branded tools are made in the United States, Cougar Pro tools are designed in the United States and manufactured in Taiwan.

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 Wright Tool: (1) made several changes to its website and social media accounts to clarify that Cougar Pro tools are made in Taiwan; and (2) sent a letter to distributors explaining the difference between Wright Tool-branded tools and Cougar Pro tools, and instructing distributors to update their marketing materials as appropriate. As part of your review, you also confirmed the accuracy of country-of-origin claims on all Cougar Pro and Wright Tool products and packaging.

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