



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

Bureau of Consumer Protection
Division of Enforcement

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Attorney

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August 19, 2015

FEDERAL EXPRESS

I. Gregg Curry IV, Esq.
McCarty Law LLP
2401 E. Enterprise Avenue
Appleton, WI 54913-7887

Dear Mr. Curry:

We received your submissions on behalf of Ariens Company (“Ariens” or the “Company”). During our review, we discussed concerns that “American Craftsmanship” claims for outdoor power equipment, including snow blowers, may overstate the extent to which such products are made in the United States. Specifically, although the Company’s products are designed and assembled in the United States, some items include significant imported content.

In your submissions, you stated that Ariens has implemented a remedial action plan to correct its representations and avoid future mislabeling. This plan includes: (1) removing the Company’s “American Craftsmanship” logo from all products, brochures, manuals, websites, social media, and advertising; (2) introducing a new logo that states products are “Designed & Assembled in the U.S.A.”; and (3) sending a letter to all Company dealers communicating changes to marketing materials.

Based on your statements, 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