

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

Division of Advertising Practices

Mary K. Engle Associate Director

October 13, 2011

John W. Cochrane Razor USA LLC General Counsel 16200-A Carmenita Road Cerritos, CA 90703

Re: CARU Referral of Razor USA LLC

Dear Mr. Cochrane:

The staff of the Federal Trade Commission has conducted an inquiry into certain advertising by Razor for its eSpark scooter, following a referral from the Children's Advertising Review Unit of the National Advertising Division of the Council of Better Business Bureaus (CARU). CARU referred this matter to us after the company declined to participate in CARU's self-regulatory process. Upon review of the matter, we have determined not to take additional action at this time. The Commission reserves the right to take such further action as the public interest may require.

Very truly yours,

Mary K. Engle
Associate Director

cc: Wayne Keeley, Director, CARU