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

Bureau of Consumer Protection
Division ofEnfon:ement

Julia Solomon Ensor
Attomey

Email: jensm@ftc.gov
Direct Dial: (202) 326-2377

FEDERAL EXPRESS

Ms. Linda A. Goldstein, Esq.
Manatt, Phelps & Phillips, LLP
7 Times Square
New York, NY 10036
1goldstein@manatt.com

Dear Ms. Goldstein:

June 3, 2013

We received your submissions dated January 25,2013, February 15,2013, and anM Cp6c15,2013, Little Giant inadvertently made misleading

"Made in the USA" claims for certain Little Giant
ladders. First, you indicated that three third-party distributor websites used an outdated
description of a particular Little Giant ladder to promote that ladder as "Made in the
USA" even after the Company began to make the ladder in China. Second, you indicated
that the Company inadvertently failed to recall infomercials that represented that a different Little Giant ladder was "American-Made" after the Company began importing more parts for that ladder from China and changed its claims.

After receiving Cormnission staffs letter, Little Giant explained that the
Company implemented a remedial action plan to correct its representations. This plan included: (1) ensuring that all third-party dealers corrected erroneous "Made in USA" representations; (2) re-editing the infomercial that contained misleading claims;
(3) adding country-of-origin information to every product SKU on the Little Giant website; (4) checking the Internet for unauthorized postings of outdated infomercials; 4 -1.0u9 tings c

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,

~V\0Uv Julia Solomon Ensor
Staff Attorney