Division of Advertising Practices

Mary K. Engle
Associate Director

Mr. Courtland L. Reichman
King & Spalding
1180 Peachtree Street, N.B.
Atlanta, GA 30309-3521

UNITED STATES OF AMERICA

FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580

November 17,2011

Re: NAD Referral of Merial LLC

Dear Mr. Reichman:

The staff of the Federal Trade Commission has conducted an inquiry into certain
advertising representations made by Merial LLC regarding Frontline Plus. The National Advertising Division of the Council of Better Business Bureaus ("NAD") referred this matter to us after a compliance proceeding concluded that Merial failed to modify its advertising as recommended byNAD and the National Advertising Review Board of the Council of Better Business Bureaus.

Upon review of the matter, we have detennined not to take additional action at this time. Among the factors we considered are the current pendency of federal litigation regarding the advertising at issue in