

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

Office of the Secretary

November 10, 2014

Common Sense  
State of Minnesota

*Re: In the Matter of Made in the USA Brand, LLC  
File No. 142 3121, Docket No. C-4497*

Thank you for commenting on the Federal Trade Commission's proposed consent agreement in the above-referenced proceeding. The Commission has considered your comment and placed it on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii).

In your comment, you state that, "Made in America should stand for something," and request that the Commission require marketers to substantiate their U.S.-origin and other claims. You do not propose any revisions to the draft complaint or the consent agreement.

Section 5 of the FTC Act requires companies to possess substantiation for their marketing claims, and the Commission's Enforcement Policy Statement on U.S.-Origin Claims provides specific guidance to marketers on how to substantiate those claims.<sup>1</sup> In particular, the Policy Statement provides that when a marketer makes an unqualified "Made in USA" claim, the marketer should – at the time the e e e e let1

Therefore, after considering your comment, the Commission has determined that the relief set forth in the consent agreement is appropriate and sufficient to remedy the violations alleg2(n)2(dv)2()6(te)6(r-io)22