

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Edith Ramirez, Chairwoman
Julie Brill
Maureen K. Ohlhausen
Terrell McSweeney

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)	
In the Matter of)	
)	DOCKET NO. C-4561
Step N Grip, LLC)	
a corporation.)	
)	

DECISION AND ORDER

The Federal Trade Commission (“Commission”) having initiated an investigation of certain acts and practices of Respondent Step N Grip (“Step N Grip”), a limited liability corporation, and Step N Grip having been furnished thereafter with a copy of the draft Complaint that the Bureau of Competition proposed to present to the Commission for its consideration and which, if issued by the Commission, would charge Step N Grip with violations of Section 5 of the Federal Trade Commission Act, as amended, 15 U.S.C. § 45; and

Step N Grip and counsel for the Commission having thereafter executed an Agreement Containing Consent Order (“Consent Agreement”), containing an admission by Step N Grip of all the jurisdictional facts set forth in the aforesaid draft of Complaint, a statement that the signing of said Consent Agreement is for settlement purposes only and does not constitute an admission by Step N Grip that the law has been violated as alleged in such Complaint, or that the facts as alleged in such Complaint, other than jurisdictional facts, are true, and waivers and other provisions as required by the Commission’s Rules; and

The Commission having thereafter considered the matter and having determined that it had reason to believe that Step N Grip violated the said Act, and that a Complaint should issue stating its charges in that respect, and having accepted the executed Consent Agreement and placed such Consent Agreement on the public record for a period of thirty (30) days for the receipt and consideration of public comments, now in further conformity with the procedure described in Commission Rule 2.34, 16 C.F.R. § 2.34, the Commission hereby makes the following jurisdictional findings and issues the following Order

1. Step N Gip, LLC, is a limited liability corporation organized, existing, and doing business under and by virtue of the laws of Michigan with its principal place of business in New Lothrop, Michigan
2. The Federal Trade Commission has jurisdiction over 7isd04 Tw2()1.pn over 7isd

- A. Communicating with any Competitor regarding prices or rates, or prospective prices or rates, of Step N Grip or any Competitor; ~~that~~, that for purposes of this Paragraph II.A, Communicating does not include the transfer or dissemination of information to the public through websites or other widely accessible methods of advertising such as newspapers, television, signage, direct mail or online and social media
- B. Entering into, attempting to enter into, adhering to, participating in, maintaining, organizing, implementing, enforcing, inviting, encouraging, offering or soliciting any agreement or understanding, express or implied, between or among Step N Grip and any Competitor
 - 1. To raise, fix, maintain, or stabilize prices or price levels or rate levels, or payment terms, or to engage in any other pricing action;
 - 2. To allocate or divide markets, customers, contracts, transactions, business opportunities, lines of commerce, or territories; or
 - 3. To set, change, limit or reduce service terms or service levels
- C. Exhorting, requesting, suggesting, urging, advocating, encouraging, advising, or recommending to any Competitor, either publicly or privately, that such Competitor
 - 1. Set, change, raise, fix, stabilize or maintain its prices or price levels, rates or rate levels, or payment terms, or engage in any other pricing action; or
 - 2. Set, change, reduce, limit, maintain, or reduce its service terms or service levels.
- D. Instructing or otherwise encouraging any dealer, distributor, or seller of rug devices to engage in conduct that Respondent is prohibited from engaging in under Paragraphs II.A, II.B, and II.C. of this Order.

III.

IT IS FURTHER ORDERED that Step N Grip shall

- A. Within thirty (30) days after the date on which this Order becomes final, provide to each of Step N Grip officers, directors and employees a copy of this Order and the Complaint.
- B. For a period of four (4) years from the date this Order becomes final, provide a copy of this Order and the Complaint to any person who becomes a director,

officer, or employee of Step N Grip and provide such copies within thirty (30) days of the commencement of such Person's employment or term as an officer or director.

- C. Require each person to whom a copy of this Order is furnished pursuant to Paragraph III.A. and III.B. above to sign and submit to Step N Grip within thirty (30) days of the receipt thereof a statement that (1) represents that the undersigned has read and understands the Order, and (2) acknowledges that the undersigned has been advised and understands that compliance with the Order may subject Step N Grip to penalties for violation of the Order
- D. Retain documents and records sufficient to record Step N Grip's compliance with its obligations under Paragraph III of the Order

IV.

IT IS FURTHER ORDERED that Step N Grip shall file a verified written report

VI.

IT IS FURTHER ORDERED that, for the purpose of determining or securing compliance with this order, upon written request upon five (5) days notice Step N Grip shall, without restraint or interference, permit any duly authorized representative of the Commission:

- A. Access, during office hours and in the presence of counsel, to all facilities and access to inspect and obtain copies of relevant books, ledgers, accounts, correspondence, memoranda and all other records and documents in the possession or under the control of Step N Grip assisting to compliance with this Order, which copying services shall be provided at the request of the St

Grip