



FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20540

Bureau of Consumer Protection
Division of Enforcement

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December 7, 2015

FEDERAL EXPRESS

Cameron Weiss, CEO
Weiss Watch Company, Inc.
2373 W. 208th Street
Torrance, CA 90501

Dear Mr. Weiss:

We received your submission on October 14, 2015, regarding your company, Inc. ("Weiss"). During our review, we raised concerns that certain marketing materials may have overstated the extent to which Weiss watches are made in the United States. Specifically, marketing materials source many parts in the United States, but key parts to Swiss watches imported from Switzerland.

As discussed, unqualified "Made in USA" or "Only in USA" is likely to suggest to consumers that products are made in the United States. The Commission may analyze a number of different factors to determine if a product is made in the United States, including the proportion of parts and processing attributable to U.S. parts and processing, how far removed any foreign content is from the finished product, and the importance of the foreign content to the overall function of the product.

In this case, though the cost of the Swiss parts may be small relative to the overall U.S. manufacturing costs, the imported parts are essential to the watches' function and are essential to the watches' ability to attract and satisfy consumers. We have implemented a remedial action plan that includes the following:

- (1) updating the Weiss company logo to remove the phrase "US MADE";
- (2) adding qualifying statements to marketing materials to explain that watches contain a combination of U.S. and Swiss parts; and
- (3) updating websites and social media.

Based on your actions and other factors, the staff has decided not to pursue this investigation any further. This action does not constitute a finding of no violation of section 5 of the Federal Trade Commission Act, 15 U.S.C. § 57. The Commission reserves the right to take such further action as the public interest may require.

you na

Sincerely,



Julia
S. Hall Atome