



UNITED STATES  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20548

Bureau of Consumer Protection  
Division of Enforcement

Julia S. Stiles  
Attorney

Enforcement Policy  
Direct Dial: (202) 326-2177

August 11, 2017

**VIA FEDERAL EXPRESS**

James K. Kearney, Esq.  
W. John Cahill, Esq., Director, I.P.E.  
8065 Leesburg Pike  
Tysons Corner, VA 22033-2130

Dear Mr. Kearney:

We received your submission on behalf of your client, Thales e-Security, Inc. (the "Company"). In your submission, you explained that TES made certain data security claims in the USA that are not accurate.

As you know, the Federal Trade Commission's (FTC) U.S. Origin Claims provides that unqualified "Made in USA" claims mislead customers that products are "all or virtually all" made in the United States.<sup>1</sup> Accordingly, upon discovering the error, TES implemented a comprehensive remedial action plan to avoid deceiving consumers. This plan included: (1) changing labeling on "Made in USA"; (2) relabeling products in inventory; (3) reviewing all products; (4) reviewing online descriptions for all products; (5) implementing a procedure to review products whose production has shifted from the USA to other countries; and (6) conducting a review of the Company's U.S. origin claims.

Based on your explanation and other factors, the staff has no violation of Section 5 of the Federal Trade Commission Act. The Commission reserves the right to take such further action as the public interest may require. If you have any questions, please call (202) 326-2177.

Sincerely,  
  
Julia S. Stiles  
Staff Attorney

<sup>1</sup> Federal Trade Commission, Enforcement Policy Statement on U.S. Origin Claims, 62 Fed. Reg. 63756, 63708 (Dec. 2, 1997).