



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

Bureau of Consumer Protection
Division of Enforcement

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October 21, 2020

VIA EMAIL

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Dear Mr. Polak:

We received your submissions on behalf of Keen Pump Company, Inc. (“Keen” or the “Company”). During our review, we discussed concerns that marketing materials may have overstated the extent to which certain specialty pu

As discussed, it is appropriate for Keen to promote the fact that it employs workers and assembles products in the United States. However, marketing materials should not state or imply