



FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20548

Bureau of Consumer Protection
Division of Enforcement

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April 5, 2017

VIA FEDERAL REGISTER

Larry Hicks, Executive Vice President
Cardinal Scale Manufacturing Company
203 East Daugherty St
Webb City, MO 64790

Dear Mr. Hicks:

We received your submissions on behalf of Cardinal Scale Manufacturing Company, d/b/a Detecto Scale ("Cardinal"). Your submissions indicate that your marketing materials may have overstated the extent to which all Cardinal scales are made in the United States. Specifically, although many Cardinal scales are assembled in the United States using a mix of U.S. and imported components, not all Cardinal scales are wholly imported.

As discussed, unqualified "Made in USA" claims on company marketing materials likely suggest to customers that all products advertised in those materials are "all superior quality" in the United States. Accordingly, Cardinal implemented a remedial action plan to avoid deceiving consumers. This plan includes: (1) updating marketing materials to reflect that Cardinal scales are made in the United States; (2) removing statements that imply that all Cardinal scales are made in the United States; (3) providing training sessions for sales staff; (4) sending a letter to dealers and distributors providing updated materials; and (5) updating materials to reflect that Cardinal scales are made by third-party manufacturers.

Based on your actions and other factors, the staff has decided not to pursue this investigation any further. No violation of Section 5 of the Federal Trade Commission Act has been identified. The Commission reserves the right to take such further action as may be warranted. If you have any questions, you can reach me at (202) 326-2377.

Sincerely,

Julia Solomon Ensor
Staff Attorney