



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

Bureau of Consumer Protection
Division of Enforcement

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Excel Industries, Inc.
200 S. Ridge Road
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We received your submissions on behalf of your client, Excel Industries, Hustler Turf Equipment and BigDog Mowers. In our review, we discussed concerns that certain marketing materials, which certain lawnmowers are made in the United States. Specifically, although Excel assembles mowers and performs some manufacturing, the mowers incorporate significant imported content.

As discussed, unqualified "Made in USA" claims on products and in comparative advertising material likely suggest to consumers that the products are virtually "100% made in the United States." To address these concerns, we recommend actions to avoid deceiving consumers, including: (1) discontinuing use of "Made in USA" decals for mowers; (2) discontinuing use of "Made in USA" claims and photos; (3) sending notices to dealers regarding discontinuation of "Made in USA" claims and marketing materials; (4) deleting old social media posts; and (5) discontinuing use of marketing materials, such as "Engineered in the USA" and "Designed and assembled in USA" and "Made in the USA" claims.

Based on your actions and our investigation any further. This action should not be construed as a determination by the Commission of the merits of the Federal Trade Commission Act, 15 U.S.C. § 45. The Commission reserves the right to take such further action as the public interest may require. If you have any questions, please contact the Bureau of Consumer Protection at (202) 326-7777.

Sincerely,

Julia Solomon Eberhart
Staff Attorney