



United States of America
FEDERAL TRADE COMMISSION
600 Pennsylvania Avenue, N.W.
Washington, DC 20580

Division of Advertising Practices
Bureau of Consumer Protection

Mary K. Engle
Associate Director

February 3, 2011

Andrew C. Levine, Esq.
Vice President
National Advertising Division
112 Madison Avenue, 3rd Floor
New York, NY 10017

Re: Advertisement

Dear Mr. Levine:

I am writing to follow up on the referral from the FTC. Your referral indicated that the advertiser declined to participate in the NAD's self-regulatory process.

After we contacted the company regarding the NAD referral, the NAD's investigation of the challenged claims.

Accordingly, no additional FTC action is warranted at this time. Our decision is not to be construed as a determination that a violation has not occurred. We reserves the right to take such further action as the law may require. We supports the NAD's self-regulatory process and we encourage the advertiser to continue to assist in supporting the NAD.

Very truly yours,

Mary K. Engle
Associate Director
Division of Advertising Practices