



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

Bureau of Consumer Protection
Division of Enforcement

Julia Solomon Ensor
Attorney

Email: jensor@ftc.gov
Direct Dial: (202) 326-2377

November 4, 2022

VIA EMAIL

Mr. Randall Waldron
Vice President of Sales & Marketing
Liberty Pumps, Inc.
7000 Apple Tree Ave.
Bergen, NY 14416

Dear Mr. Waldron:

We received your submissions on behalf of Liberty Pumps, Inc. ("Liberty Pumps" or the

Commission may analyze a number of different factors to determine whether a product is “all or virtually all” made in the United States, including the proportion of the product’s total manufacturing costs attributable to U.S. parts and processing, how far removed any foreign content is from the finished product, and the importance of the foreign content or processing to the overall function of the product. The “all or virtually all” standards are codified in the Made in USA Labeling Rule, 16 C.F.R. § 302.4 (the “MUSA Labeling Rule”).

For a product that is substantially transformed in the United States, but not “all or virtually all” made in the United States, the Policy Statement explains “any claim of U.S. origin

FTC staff members are available to work with companies to craft claims that serve the dual purposes of conveying non-deceptive information and highlighting work done in the United States. Based on Liberty Pumps' actions and other factors, the staff decided not to pursue this investigation any further. This should not be construed as a determination that there was no violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45 or the MUSA Labeling Rule, 16 C.F.R. Part 323. The Commission reserves the right to take such further action as the public interest may require. If you have any questions, please feel free to call.

Sincerely,

A redacted signature consisting of a blue scribble above a solid black rectangular box.