



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

Bureau of Consumer Protection
Division of Enforcement

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March 26, 2015

FEDERAL EXPRESS

Ronald Y. Rothstein, Esq.
Partner
Winston & Strawn LLP
35 W. Wacker Dr.
Chicago, IL 60601-9703

Dear Mr. Rothstein:

We received your submissions dated March 10, 2015, and March 17, 2015, regarding www.webuildamerican.com (the "Website"), a website maintained by your client, 84 Lumber Company ("84 Lumber"). During our review, we discussed concerns that the Website, designed as a resource to help builders and consumers locate U.S.-origin building materials, might mislead consumers by failing to disclose that some featured manufacturers sell a mix of U.S.- and foreign-origin products, or by overstating the extent to which featured manufacturers make their products in the USA.

In response to Commission staff's inquiry, 84 Lumber agreed to clarify the Website by adding prominent disclosures to the Home and Building Products pages explaining that some featured manufacturers offer products not made in the USA. Additionally, the Website contains a disclosure stating that 84 Lumber does not verify U.S.-origin claims made by featured manufacturers.

Based on your statements, the staff has decided not to pursue this investigation further. This action 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. The Commission reserves the right to take such further action as the public interest may require. If you have any questions, you can reach me at (202) 326-2377.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Ensor".

Julia Solomon Ensor
Staff Attorney