



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

October 11, 2017

VIA FEDEX

Mr. Ian Van Sice
Vice President of Projects & Technology
Georgia Exposition Manufacturing Corporation
3355 Martin Farm Road, Suite 100
Suwanee, GA 30024

Dear Mr. Van Sice:

We received your submissions on behalf of Georgia Exposition Manufacturing Corporation ("Georgia Expo"). During our review, we discussed concerns that certain marketing materials may have overstated the extent to which Georgia Expo products are made in the United States. Specifically, although Georgia Expo sells a line of disposable waste containers that is made in the United States, certain Georgia Expo pipe and drape and other display products contain significant imported content.

As discussed, unqualified "Made in USA," "Manufactured in USA," or "Built in USA" claims in company marketing materials likely suggest to consumers that all products advertised in those materials are "all or virtually all" made in the United States. Accordingly, Georgia Expo implemented a comprehensive remedial action plan to avoid deceiving consumers. This plan included: (1) updating product specification sheets, packing materials, and marketing inserts; (2) introducing qualified U.S.-origin claims where appropriate; (3) launching an updated website and releasing updated catalogues; (4) reviewing and updating social media postings on all platforms; (5) editing promotional videos that contain unqualified U.S.-origin claims; (6) training sales staff; and (7) sending notices to distributors regarding changes to marketing materials.

Based on your actions and other factors, the staff has decided not to pursue this investigation any 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