



United States of America
FEDERAL TRADE COMMISSION
Washington, DC 20580

Bureau of Consumer Protection
Division of Advertising Practices

September 27, 2013

Bradley J. Gross, Esq.
Law Office of Bradley Gross, PA
2645 Executive Park Drive
Suite 119
Weston, FL 33331

Re: Advance Your Child, LLC, FTC File No. 132-3079

Dear Mr. Gross:

The staff of the FTC's Division of Advertising Practices has conducted an investigation of Advance Your Child, LLC, for possible violations of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, in connection with its advertising for the *My Talking Toddler* early childhood education DVD program. Our inquiry focused specifically on whether Advance Your Child made misleading claims on its website, www.mytalkingtoddler.com, that *My Talking Toddler* DVDs improve the language and communication skills of children with autism or speech delays, and that the DVDs were tested on children, including autistic children. In particular, staff was concerned that Advance Your Child did not possess a reasonable basis for these claims because it lacked any empirical testing of *My Talking Toddler*'s efficacy for children with or without autism or speech delays.

Despite our concern, upon careful review of the matter, including non-public information submitted to the FTC, staff has decided not to recommend enforcement action at this time. The factors we considered in making this determination included Advance Your Child's revision of its website to eliminate autism, speech delay, and testing claims, the limited scope of the advertising, and the low sales of the DVDs.

This action is not to be construed as a determination that a violation of law did not occur, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.

Very truly yours,

A handwritten signature in cursive script that reads "Mary K. Engle".

Mary K. Engle
Associate Director