



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

Bureau of Consumer Protection  
Division of Enforcement

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**FEDERAL EXPRESS**

Ms. Linda A. Goldstein, Esq.  
Manatt, Phelps & Phillips, LLP  
7 Times Square  
New York, NY 10036  
[lgoldstein@manatt.com](mailto:lgoldstein@manatt.com)

Dear Ms. Goldstein:

We received your submissions dated January 25, 2013, February 15, 2013, and May 20, 2013, on behalf of Little Giant Ladders, Inc. ("Little Giant" or the "Company"). In correspondence and discussions, you identified two instances where Little Giant inadvertently made misleading "Made in the USA" claims for certain Little Giant ladders. First, you indicated that three third-party distributor websites used an outdated description of a particular Little Giant ladder to promote that ladder as "Made in the USA" even after the Company began to make the ladder in China. Second, you indicated that the Company inadvertently failed to recall infomercials that represented that a different Little Giant ladder was "American-Made" after the Company began importing more parts for that ladder from China and changed its claims.

After receiving Commission staff's letter, Little Giant explained that the Company implemented a remedial action plan to correct its representations. This plan included: (1) ensuring that all third-party dealers corrected erroneous "Made in USA" representations; (2) re-editing the infomercial that contained misleading claims; (3) adding country-of-origin information to every product SKU on the Little Giant website; (4) checking the Internet for unauthorized postings of outdated infomercials; and (5) updating call center training protocols and scripts.

Based on the Company's statements, 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 ("FTC 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 black ink, appearing to read "J. ENSOR". The signature is fluid and cursive, with the first letter "J" being particularly large and stylized.

Julia Solomon Ensor  
Staff Attorney