



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
600 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20580

Division of Enforcement
Bureau of Consumer Protection

September 26, 2011

James P. Connors, Esq.
Jones Hirsch Connors & Bull P.C.
One Battery Park Plaza, 28th Floor
New York, New York 10004

Dear Mr. Connors:

The staff of the Federal Trade Commission ("FTC") has received your submission of June 23, 2011 on behalf of your clients, jointly referred to as "IKEA," and individually listed in your letter.

In your letter, you asserted that one of your suppliers had mislabeled certain mattresses and sofas as "Made in United States," even though the products actually were imported. You state that the supplier explained they had inadvertently used the same labels for the imported products that it used for those it produced in the United States. According to your letter, after IKEA discovered that the supplier was affixing incorrect origin labels to its imported products, IKEA required that the supplier immediately cease the practice. IKEA is not permitting the shipment of improperly marked goods from the supplier's warehouse to IKEA stores until the supplier takes corrective action. In addition, your letter indicates that IKEA and the supplier are establishing a program to have all mislabeled sofas and mattresses remaining in IKEA's inventory returned to the supplier or an IKEA terminal for removal of the "Made in United States" labels and replacement with labels identifying the actual country of origin. You also state that IKEA and the supplier are taking steps to avoid any possible recurrence and will be conducting audits to make sure the appropriate labeling practice is followed. IKEA also requested that the supplier's employees be issued further guidelines on appropriate country-of-origin marking.

Based on IKEA's immediate and continuing corrective action and self-reporting, the staff has decided not to recommend enforcement action at this time. This 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, I can be reached at (202) 326-2890.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Koss", written over a horizontal line.

Laura Koss
Staff Attorney