



VIA: eMail
July 17, 2017

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.
P.O. Box 927
Madison, CT 06443

RE: Letter of July 11, 2017, alleging marketing misrepresentations

Dear Mrs. Smith,

I am writing in response to your letter/email of July 11, 2017, in which you accused The Step2 Company, LLC ("Step2") of various deceptive representations related to our status as a US manufacturer.

I appreciate your direct communication to us of your concerns. As stated on the website page you cite in your letter, we want to communicate clearly with our customers. We want to fix any level of misunderstanding, or miscommunication to the extent that they exist. Based on your letter, I believe, we may be able to make some improvements to the consistency of our communication.

I conducted an initial review of some products identified on www.step2.com/made-in-usa with an unqualified claim. In all cases I reviewed, the products meet the requirements for an unqualified "Made in USA" claim, despite the individual product pages listing them as being made of US and imported parts. As you may have read on our website, historically we have set a higher standard for ourselves than what the FTC requires. We decided to label any product containing any amount of foreign content with a qualified claim, even though that product could have been labeled with an unqualified claim according to FTC guidelines. Most of the products you see on the website with a qualified claim actually meet the requirements for an unqualified claim.

Over time, different areas of our website have evolved and your letter brings to light how perceived inconsistencies can send a confusing message. Because your letter demanded such a short turnaround time, we have temporarily removed the www.step2.com/made-in-usa webpage while we run a thorough and thoughtful analysis on all our products. In addition, we have suspended all marketing and social media related to "Made in USA" while we develop a new and a consistent approach that does not cause the confusion you suggested in your letter.

The reality is that we are a US manufacturer with two large manufacturing facilities in Ohio that employ approximately 600 people. Our employees are proud and happy to work with a company striving to keep that work here in the US.

Thank you for your letter. Should you have any more questions or concerns, please let me know.

Holly Ohlrich

Holly A. Ohlrich
The Step2 Company, LLC