March 22, 2018

Attn.: Jason Bagley
Staff Writer

www.truthinadvertising.org

Re: Media Inquiry re Wolverine’s Made in USA Marketing

Dear Mr. Bagley,

Thank you for reaching out to Wolverine’s Marketing Department to inquire about the origin of materials for our Wolverine 1000 Mile boots. While we understand you were provided some preliminary answers to your inquiries, we wanted to take the time to issue a more comprehensive response which we hope will address your concerns.

Upon receiving your inquiry, we took a top to bottom look at product components that go into making a Wolverine 1000 Mile boot to ensure that, in each instance, we had the appropriate support for the claims we were making. Following guidelines by the Federal Trade Commission (FTC), we focused on the origin of significant parts and processing that go into making our 1000 Mile boots to confirm U.S. origin.

As you are aware, a significant component is any part of a product that is essential to its creation and functionality. In the case of the Wolverine 1000 Mile boot, we consider significant parts to include the upper, outsole, and laces. For this reason, whenever we use significant components sourced from places outside of the United States territory, we make it explicitly clear on our product descriptions on our website, as well as in other forms of social media and advertising, the origin of those parts so that our customers know which of our products contain significant parts that are sourced from the U.S. territory, and which products are assembled in the United States with the finest materials sourced from around the world. To this end, all styles with significant parts sourced from outside of the USA are described as “Made in the USA with globally sourced materials.” See here, here and here. We do wish to point out, however, that the final processing and packaging of all of our 1000 Mile boots take place in the United States by American workers.

We take this opportunity to offer some additional background on our Wolverine 1000 Mile boot which was first introduced in 1914 as a work boot. Thanks to its timeless design, it is a pattern that is still relevant today. When we reintroduced the boot in 2009, we intentionally chose to stay true to our heritage and handcraft it in the United States. From the cutting of leathers, to stitching the upper, to the welting of the bottom, we are making this boot in the United States by American workers. The team in the American factories we partner with craft each boot by hand, and by choosing to make it in the USA, we provide support for the American economy and workers.
In addition to each 1000 Mile boot being crafted by hand in the United States, our team of designers and developers, also located in Rockford, Michigan, work on each pattern and thoughtfully select materials used. When those thoughtfully selected materials cannot be sourced from the United States or if a customer chooses a material that cannot be sourced locally, we search around the world for the finest materials available. For example, we work with Charles F. Stead of England to procure premium suedes that meet our high-quality standards and our customer demands. As you may be aware, we offer a custom program whereby customers can choose what materials they want in the customizable 1000 Mile boots. With such high degree of customization involved in the creation of each 1000 Mile boot, our customers are able to choose the materials they want to wear and those materials are put together and packaged by American workers to build a unique product that our customers love.

Since receiving your inquiry, we have made certain enhancements to our site to further break down product information in order to address any concerns related to the origin of significant parts found in our Wolverine 1000 Mile boots. Some of those enhancements are listed below:

- We have removed the American flag banner from certain landing pages within our site.
- On social media, we removed all instances #MadeintheUSA, and in the future, will add the qualifier #withgloballysourcedmaterials. We note that this was already noted in our website. However, to the extent it helps make it clearer that some of the components may be sourced from abroad, where appropriate or necessary, we feel it is a positive enhancement.
- We have added additional product information to certain styles.
- We have provided our customer service team with more detailed information on the appropriate significant parts for each product so that they can effectively communicate accurate product information and respond to inquiries from our customers and others interested in obtaining product information.

We hope you have found this communication helpful. Of course, if you have any additional questions or further input you would like to provide, please do not hesitate to contact us. It is our sincere hope that we have addressed your queries to your satisfaction.

Best Regards,
Team Wolverine