

August 26, 2026

The Honorable Andrew N. Ferguson
Chairman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Request for Investigation of Online Marketplace AI Shopping Tools, Country-of-Origin Disclosures, and the Promotion of Foreign-Made Products

Dear Chairman Ferguson:

The Alliance for American Manufacturing (AAM) respectfully urges the Federal Trade Commission (FTC) to investigate whether artificial intelligence shopping assistants deployed by major online marketplaces are providing consumers with accurate, complete, and non-misleading country-of-origin information, and whether these systems are steering consumers toward foreign-made products, including products made in China, while failing to provide comparable visibility for products made in the United States.

AAM is a non-profit, non-partisan partnership established by leading manufacturers and the United Steelworkers. We advocate for policies that strengthen domestic manufacturing, support American workers, and ensure that consumers have the information necessary to make informed purchasing decisions.

Americans have made clear that they want to buy products made in the United States and expect online marketplaces to provide the information necessary to do so. In a Morning Consult survey conducted for AAM in October 2025 among 2,201 U.S. adults, 76 percent said they prefer to purchase products made in the United States, if possible, with respondents citing the creation of American jobs and growth of the U.S. economy as the leading reasons for that preference. When given a choice between a product made in the United States and a similar imported product, 82 percent said they would be likely to select the American-made product. Moreover, 83 percent said they “would purchase more goods that are made in the United States if they were more widely available through large retailers like Target, Walmart, and Amazon.”¹

The same survey demonstrates that country-of-origin information is material to consumers and remains inadequately accessible online. Although 51 percent of respondents said it was easy to determine where a product was made while shopping online, 35 percent reported that doing so was difficult. Seventy-seven percent supported requiring online retailers to display country-of-origin labels as physical stores do, and 80 percent agreed that including such labels helps consumers make more informed choices. In addition, 66 percent supported fines and other penalties for companies that deceptively market

¹ Morning Consult, *Made in America* survey conducted for the Alliance for American Manufacturing among 2,201 U.S. adults, October 27–28, 2025. https://www.americanmanufacturing.org/wp-content/uploads/2025/11/AAM_Made-in-America_6Nov2025-Report-1.pdf.

products as “Made in USA.”² These findings demonstrate both strong demand for American-made goods and an expectation that online marketplaces will provide accurate, accessible, and non-misleading origin information.

A July 2026 report, *Made in America, Hidden by AI*, raised serious concerns that AI-powered shopping assistants operated by major online marketplaces may be inconsistently presenting country-of-origin information to consumers. The report suggest that when consumers search for products made in the United States, AI shopping tools may respond that such information is unavailable, inaccessible, or difficult to verify.³ Yet those same tools appear capable of identifying and recommending products associated with China or other foreign sources, and in some cases may be able to detect conflicting or questionable origin claims within product listings.

If accurate, this dynamic is deeply troubling. Online marketplaces already play an outsized role in determining which products consumers see, compare, and ultimately purchase. As AI shopping assistants become more widely integrated into the consumer shopping experience, these systems will increasingly operate not merely as passive search tools, but as active recommendation engines. If those systems make it easier for consumers to find products made in China than products made in the United States, the result is not a neutral marketplace. It is a digital environment that disadvantages American manufacturers, weakens consumer choice, and undermines confidence in the integrity of online commerce.

Consumers should not have to outsmart an algorithm to find American-made products. Nor should online marketplaces be allowed to benefit from vague, inconsistent, or contradictory country-of-origin practices that make it easier for foreign imports to compete against goods made by American workers. When a consumer asks for Made in USA products, the response should not be confusion, evasion, or an unsupported claim that the information cannot be accessed. If the relevant information exists on the platform, or if the platform has tools capable of assessing origin claims, consumers deserve clear and accurate disclosure.

This concern is particularly acute with respect to products made in China. For years, American manufacturers have faced unfair competition from Chinese producers that benefit from state subsidies, weak labor standards, intellectual property theft, forced technology transfer, and other non-market practices. When online marketplace tools promote or surface Chinese-made products while obscuring American-made alternatives, they compound the injury to domestic manufacturers and workers. Such practices also undermine the ability of consumers to act on their stated preference to support American jobs, American production, and American communities.

The Commission has long recognized that country-of-origin claims are material to consumer purchasing decisions. The FTC’s Made in USA standard requires that unqualified Made in USA claims be truthful and substantiated, and that products marketed as Made in USA be “all or virtually all” made in the United States. The Commission also has broad authority under Section 5 of the Federal Trade Commission Act

² Ibid.

³ Erie Meyer & Zachary Harris, *Made in America, Hidden by AI: AI Shopping Chatbots Reveal How Amazon and Walmart Hurt American Manufacturers and Deceive Shoppers*, Center for Law and the Economy, Columbia Law School (July 2026). Link: <https://law-and-economy.law.columbia.edu/sites/law-and-economy.law.columbia.edu/files/content/Made%20in%20America%2C%20Hidden%20by%20AI.pdf>

to police unfair or deceptive acts or practices, including misleading advertising and representations that affect consumer purchasing decisions.

AI shopping assistants are yet another potential vector for consumer deception. The Commission should examine whether marketplace operators are designing, deploying, or failing to supervise AI systems in ways that effectively obscure material country-of-origin information, amplify questionable foreign-made products, or suppress accurate information about American-made goods in manners that mislead reasonable consumers about the availability of U.S.-origin products, thereby materially inducing their purchasing decisions.

Recent polling also underscores why the deployment of AI shopping assistants demands close scrutiny. In a December 2025 Morning Consult survey conducted for AAM among 1,800 registered voters, 69 percent, nearly seven in ten, said they were concerned that AI could negatively impact manufacturing jobs in the United States. That concern crossed party lines, with 70 percent of Democrats and 70 percent of Republicans expressing concern.⁴

These findings should matter to the Commission. Americans are not merely concerned about AI in the abstract. They are concerned that AI systems could be deployed in ways that weaken job creation, disadvantage domestic production, and further tilt markets against American workers and manufacturers. Those concerns become more immediate when AI shopping tools appear to make it easier for consumers to find products made in China while failing to provide comparable visibility for products made in the United States. If marketplace AI systems are steering consumers toward foreign-made goods, obscuring reliable Made in USA information, or failing to surface domestic alternatives, they risk turning public concern about AI into a concrete marketplace harm.

Consumers who want to support American workers should not be diverted toward Chinese-made products because a marketplace chatbot fails to surface reliable origin information. American manufacturers should not be forced to compete not only against subsidized foreign producers, but also against opaque recommendation systems that determine what consumers can easily find.

Accordingly, AAM respectfully requests that the Commission open an investigation into AI-powered shopping assistants and country-of-origin practices on major online marketplaces. Specifically, the Commission should examine:

1. Whether AI shopping assistants provide accurate and consistent country-of-origin information when consumers request Made in USA products, Made in China products, or products from other foreign sources.
2. Whether marketplace AI tools are more likely to identify, recommend, or promote foreign-made products, including products made in China, than comparable American-made products.

⁴ Morning Consult, *Voter Attitudes on AI Headed into 2026* survey conducted for the Alliance for American Manufacturing among 1,800 U.S. registered voters, December 16–18, 2025. https://www.americanmanufacturing.org/wp-content/uploads/2026/02/AAM_AI-Sentiment_23Jan2026_.pdf.

3. Whether representations that country-of-origin information is unavailable or inaccessible are accurate when such information appears elsewhere on the platform, can be inferred from product data, seller disclosures, import information, or listing content, or appears on an imported article or its container pursuant to 19 U.S.C. § 1304.
4. Whether marketplace operators possess AI tools capable of identifying contradictory, misleading, or potentially fraudulent origin claims, and whether those tools are being used to protect consumers.
5. Whether marketplace product listings contain inconsistent or deceptive origin representations, including listings that suggest a product is Made in USA while also indicating foreign manufacture, foreign sourcing, or foreign shipment.
6. Whether the design and deployment of AI shopping assistants may constitute an unfair or deceptive act or practice when material country-of-origin information is withheld, obscured, inconsistently presented, or selectively surfaced.
7. Whether additional Commission guidance or rulemaking is needed to ensure that online marketplaces establish meaningful procedures for verifying country-of-origin claims and making such information accessible to consumers, the ultimate purchasers of such products.

The Commission should also consider whether these practices frustrate the objectives of existing Made in USA enforcement. The FTC can and should continue to pursue sellers that falsely claim their products are Made in USA. But enforcement will remain incomplete if dominant online marketplaces are not required to provide consumers with clear country-of-origin information, or if AI systems can obscure that information at the precise moment consumers are trying to make an informed purchasing decision.

This matter also demonstrates the urgent need for the Trump Administration and Congress to modernize country-of-origin disclosure laws and policies for the e-commerce era. AAM strongly supports Senator Tammy Baldwin's *Country of Origin Labeling Online Act, or COOL Online Act*. The legislation would require clear country-of-origin disclosures for products sold online, giving consumers the same basic transparency in digital marketplaces that they receive in brick-and-mortar stores. As demonstrated in the previously cited polling, that reform directly reflects current consumer expectations.

Recent concerns regarding AI shopping assistants show why the *COOL Online Act* is more necessary than ever. As AI becomes a central gateway to online commerce, origin information must be standardized, conspicuous, accurate, and accessible to both consumers and the systems generating product recommendations. Without clear disclosure requirements, consumers will remain dependent on opaque marketplace systems that may or may not communicate where a product is made. That is not a fair marketplace. It is not a transparent marketplace. And it is not one that serves American workers, manufacturers, or consumers. That information gap has real consequences when an overwhelming majority of Americans say they would choose a U.S.-made product over a similar imported product and would purchase more American-made goods if those products were more widely available through major retailers.

AAM respectfully urges the Commission to act promptly. The rapid integration of AI into online shopping means that these practices could quickly become embedded across the digital economy. If left unchecked, AI shopping systems may further entrench the dominance of foreign-made products, including products from China, while making it harder for consumers to identify goods made by American workers. The FTC has both the authority and the responsibility to ensure that new technologies do not become new vehicles for deception, unfair competition, or the erosion of consumer choice.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott N. Paul". The signature is fluid and cursive, with the first name "Scott" and last name "Paul" clearly distinguishable.

Scott N. Paul
President
Alliance for American Manufacturing