

April 20, 2009

Bruce Fein, Esq.
David Saltzman, Esq.
1025 Connecticut Avenue
Suite 1000
Washington, D.C. 20035

Re: “Turks Head Toilet Bowl Brush”

Dear Messrs Fein and Saltzman:

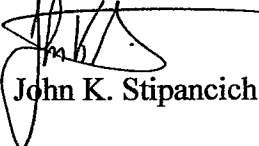
I am responding to your letter of April 7, 2009 addressed to Mark Ketchum of Newell Rubbermaid regarding the above-captioned matter. Please direct all future correspondence regarding this matter to my attention at the address below.

As a corporation that is well-recognized throughout the world as promoting diversity, inclusion and sensitivity, we greatly appreciate you bringing this matter to our attention. Please recognize that Rubbermaid Commercial Products (“RCP”) does not utilize any references to “Turk’s Head” in marketing any of its toilet bowl cleaning accessories. Similarly, we do not encourage or promote the use of such terminology by any of our customers or distributors. In fact, RCP does not even recognize the term as being one that is utilized in the commercial cleaning industry.

We will ensure all of our marketing and sales associates are aware of the possible negative connotations associated with this terminology, and that such individuals continue to refrain from its use. Please note that RCP does not dictate how our customers and distributors market RCP products. Nevertheless, we will educate our marketing and sales associates of the potential derogatory connotations associated with the terminology, and ask that they pass on such to our customers/distributors if asked to provide input into their marketing and promotion of RCP products.

One final note, as you are likely aware, the First Amendment does not apply to the use of any such terminology as there is no state action involved in the commercial marketing of products for sale to the general public. As such, I fail to understand the relevance of the First Amendment reference in your letter.

Thank you for your time and attention to this matter.

Sincerely,

John K. Stipancich

Cc: Mark D. Ketchum
Robert Heisner