

Complaint

IN THE MATTER OF

UNITED DIATHERMY, INC.

COMPLAINT, FINDINGS, AND ORDER IN REGARD TO THE ALLEGED VIOLATION OF
SEC. 5 OF AN ACT OF CONGRESS APPROVED SEPT. 26, 1914

Docket 4453. Complaint, Jan. 28, 1941—Decision, July 20, 1942

Where a corporation, engaged in interstate sale and distribution of its "United Short Wave Diathermy" device, for home use in self-administered applications of diathermy; by means of advertisements—

- (a) Represented that its said device or apparatus, when used in the treatment of self-diagnosed diseases and ailments by self-application in the home, was a safe, harmless, and effective means for treatment of rheumatism in its various forms in all parts of the body, arthritis, neuritis, bursitis, lumbago, sciatica, neuralgia, sinus trouble, and colds, and for the alleviation of pain resulting from such conditions;

The facts being diathermy is not a safe therapeutic adjunct for unsupervised home use; said device was not a competent treatment for acute arthritis characterized by infection, acute bursitis, sinus trouble in which there is a retention of pus, or for any disease or condition involving an acute inflammatory process; application in excess dosage in cases where there are advanced blood vessel changes of the legs will not only cause serious burns but lead to gangrene and necessitate amputation; use of such a device for symptoms of neuralgia or neuritis without proper diagnosis may result in fatally delaying treatment of underlying disease or cause; and application in area of the body where appreciation of heat has been impaired or lost may result in serious burns; and

- (b) Failed to reveal all the facts material in the light of said representations or with respect to aforesaid consequences which might result from the use of said device under prescribed or usual conditions;

With effect of misleading and deceiving a substantial portion of the purchasing public into the mistaken belief that such statements were true, thereby inducing it, because of such belief, to purchase said device:

Held, That such acts and practices, under the circumstances set forth, were all to the prejudice and injury of the public, and constituted unfair and deceptive acts and practices in commerce.

Before *Mr. Lewis C. Russell*, trial examiner.

Mr. R. A. McOuat, *Mr. James I. Rooney* and *Mr. William M. King* for the Commission.

Mr. Mortimer Cohn, of New York City, for respondent.

COMPLAINT

Pursuant to the provisions of the Federal Trade Commission Act, and by virtue of the authority vested in it by said act, the Federal Trade Commission, having reason to believe that United Diathermy, Inc., a corporation, hereinafter referred to as respondent, has violated

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the provisions of the said act, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, hereby issues its complaint, stating its charges in that respect as follows:

PARAGRAPH 1. Respondent, United Diathermy, Inc., is a corporation, created, organized and existing under and by virtue of the laws of the State of New York, with its office and principal place of business at 100 West Forty Second Street, New York, N. Y.

PAR. 2. The respondent is now, and for more than 1 year last past has been, engaged in the sale and distribution of a certain device or apparatus designated as United Short Wave Diathermy.

In the course and conduct of its business, the respondent causes said device or apparatus, when sold, to be transported from its place of business in the State of New York, to purchasers thereof located in various other States of the United States and in the District of Columbia.

Respondent maintains and at all times mentioned herein, has maintained a course of trade in said device or apparatus, in commerce, between and among the various States of the United States and in the District of Columbia.

PAR. 3. In the course and conduct of its aforesaid business, the respondent has disseminated and is now disseminating, and has caused and is now causing the dissemination of, false advertisements concerning its said product by the United States mails and by various other means in commerce, as commerce is defined in the Federal Trade Commission Act; and respondent has also disseminated and is now disseminating, and has caused and is now causing the dissemination of, false advertisements concerning its said product, by various means, for the purpose of inducing, and which are likely to induce, directly or indirectly, the purchase of its said product in commerce, as commerce is defined in the Federal Trade Commission Act.

Among, and typical of, the false, misleading, and deceptive statements and representations contained in said false advertisements, disseminated and caused to be disseminated, as hereinabove set forth, by the United States mails, by advertisements in newspapers, by radio continuities and other advertising literature, are the following:

Arthritis alleviated by short wave diathermy. Modern science has given us a great discovery * * * short wave diathermy for the home. a FREE demonstration will convince you, as it has many others, of the pain relieving penetrating heat it produces. Prominent physicians and leading hospitals today approve of short wave diathermy for Arthritis—Bursitis—Neuralgia—Rheumatism—Lumbago—Sciatica—Neuritis—Sinus Trouble. Illustrated booklet mailed on request.

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United Diathermy, Inc.

INNER HEAT FOR INNER HEALTH

100 West 42nd St., N. Y. C.

Why Suffer? Relieve Pains of

Rheumatism	Sciatica
Bursitis	Arthritis
Lumbago	Neuralgia
Sinus Trouble	Neuritis

Now, in your own home United Diathermy offers you a new home unit just as efficient as equipment used in hospitals, yet as easy to operate as your radio. You, too, can get quick relief from rheumatic or muscular pains.

Don't keep on suffering, day after day. Science has found a way to alleviate your agonizing pains * * * a remedy so simple and effective. Short wave diathermy is being used successfully. Today YOU can alleviate quickly the agonizing pains. Why suffer any longer? The United portable model is as simple and safe to operate as your radio. It is just as efficient as the equipment used in hospitals. In order to prove to you what United Short Wave Diathermy can do for you, we invite you to try it in your own home. Just fill out the coupon and you can have a free trial right in your own home. Mail this coupon today. This offer free to anyone living within 200 miles of New York City.

Short Wave Diathermy Relieved My Leg Pains (picture of woman with device applied to leg above and below knee).

To you who suffer from all forms of Rheumatic discomfort such as arthritis, neuritis, bursitis, lumbago, sciatica, neuralgia, sinus trouble, colds, and rheumatism in all parts of the body, we dedicate this booklet. Short Wave Diathermy—science's latest most amazing achievement—here is a method that accomplishes what it sets out to do—alleviates the pain from all forms of rheumatic and muscular discomfort. United Short Wave Diathermy for Home Use. A new era in self-treatment—a method that is simplicity itself—a method that you can use for alleviation of your pains in the privacy and comfort of your own home. (Short Wave Diathermy) electro magnetic waves (radio waves) are converted into heat that is able to penetrate deeply into the body.

Simple—Efficient—Safe.

A safe, simple and effective means to alleviate your pain. No longer do you have to take your clothes off—penetrates even through your shoes. One of the best times to take a United Short Wave treatment is at night before you go to sleep * * * Your body is more receptive to beneficial treatment and retains the heat longer. As you can see in the pictures throughout this booklet, the method of applying the new United Short Wave Diathermy is so simple that anyone can use it safely and effectively.

People everywhere are finding out for themselves * * * that short wave diathermy can alleviate pains due to arthritis, neuritis, bursitis, lumbago, sciatica, neuralgia, sinus trouble, and all forms of rheumatism. Short wave diathermy has the approval of medical men * * * it is used in hospitals and other medical institutions. Short wave diathermy is so simple and so safe, that even a child can use it. * * * Thousands of people have found relief from pain in short wave diathermy. It's safe * * * sure. It's approved by medical authorities. There's no reason why anyone should continue to suffer pain and discomfort. Short wave diathermy is the scientific answer to pain.

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A good many of us suffer from painful conditions of the shoulders, back, chest, feet, head, arms, knees, and other parts of the body. United Short Wave Diathermy can alleviate these conditions. The modern way of alleviating your pains is with United Short Wave Diathermy.

With United, you can take these Short Wave treatments easily and effectively yourself, in your own home and without the assistance of anyone.

PAR. 4. By the use of the representations hereinabove set forth and other representations similar thereto not specifically set out herein, respondent represents that its device or apparatus, advertised as United Short Wave Diathermy, when used by the unskilled lay public in the treatment of self-diagnosed diseases and ailments of the human body by individual self-application in the home, is a scientific, safe, harmless, and effective means and method for the treatment of rheumatism in its various forms in all parts of the body, arthritis, neuritis, bursitis, lumbago, sciatica, neuralgia, sinus trouble, and colds, and for the alleviation of pain resulting therefrom, and that its use will have no ill effects upon the human body.

PAR. 5. The foregoing representations are grossly exaggerated, false, and misleading. Respondent's device or apparatus, designated as United Short Wave Diathermy, is composed principally of a transformer, a short wave generator, two radio tubes and two coils housed in a portable cabinet. The device operates upon approximately a 13 meter wave length with a power output of approximately 160 watts. The power is obtained from house current by the necessary connection and transmitted through said device to the patient by means of two electric cords, each of which terminates in an insulated electrode. The application to the patient is made usually by placing the electrodes in such position that the power may pass between said electrodes through the affected area, at stated intervals for varying periods of time.

The individual self-application of said device by the unskilled lay public in the home, under the conditions prescribed in said advertisements or under such conditions as are customary or usual, will not accomplish the results claimed by the respondent and is not a scientific, safe, harmless, and effective means and method to be used in the treatment of self-diagnosed diseases and ailments of the human body, or for the alleviation of pain resulting therefrom, and may cause severe electric burns or other serious and irreparable injury to health.

The said device does not constitute a competent treatment for conditions of acute inflammation of the nerves, such as neuritis, neuralgia, sciatica, and lumbago, and acute inflammation of the joints, such as bursitis, arthritis, and lumbago, or rheumatic pains associated with acute inflammatory conditions of the nerves and joints, and

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its use in such conditions may result in further swelling of inflamed tissue, thereby increasing the congestion of the inflamed part and spreading the inflammation to adjacent tissue and allowing the absorption of toxins, if present.

Furthermore, the use of said device for the relief of pain due to neuralgia or neuritis, which may be symptoms of some deeper underlying disease or cause such as tumor, tuberculosis, syphilis, cancer, or diabetes, may fatally delay proper diagnosis and treatment.

The application of diathermy in conditions of acute sinus trouble may result in further increasing congestion of the mucous membrane of the sinuses, nose, and throat, causing increased absorption of bacterial toxins, if present, perpetuating the congestion of the mucous membrane.

The application of said device by the unskilled layman in the treatment of pains in the knees may fatally delay proper diagnosis and treatment, in that cancer of the spine may; and often does, evidence itself by severe pain in said areas.

Diathermy, when applied in excess dosage in the treatment of severe pains in the extremities in the presence of advanced blood vessel changes of the legs, may cause serious burns and may directly lead to gangrene and necessitate amputation of the legs.

When diathermy is applied to areas which may be affected by malignant tumors, such use may result in stimulating the growth of cancerous cells or in spreading the trouble to other tissues.

In those areas of the skin where the sense of heat has been lost, due to injury or impairment of the peripheral nerves, the application of said device may result in tissue destruction and severe burns.

There are many diseases and conditions in the treatment of which diathermy would be contra-indicated. There are other conditions in which the efficacy of diathermy is dependent upon the method and duration of its use. In both of the above classes of cases the use or improper use of diathermy might aggravate rather than relieve such conditions. Furthermore, many conditions, including some of those for which respondent recommends its device, are sometimes symptomatic or indicative of underlying systemic disorders for which treatment by diathermy would have no therapeutic value and might even be injurious. It would be impossible for a member of the lay public to correctly diagnose his ailment or condition or to determine the underlying cause of such disorder. It would also be impossible for such person to correctly determine the method and duration of the use of diathermy. Consequently, the use of diathermy requires the diagnosis of the ailment or condition by a competent medical

authority in order to determine if diathermy is indicated and the method and duration of treatment which should be prescribed.

PAR. 6. In addition to the representations hereinabove set forth, the respondent has also engaged in the dissemination of false advertisements in the manner above set forth, in that said advertisements so disseminated fail to reveal all facts material in the light of such representations or material with respect to consequences which may result from the use of said device or apparatus, under the conditions prescribed in said advertisements, or under such conditions as are customary or usual, and that the use of said device may result in serious and irreparable injury to health.

The said advertisements are further false, as aforesaid, in that said advertisements also fail to conspicuously reveal that the device may be safely used only after a competent medical authority has determined, as a result of diagnosis, that diathermy is indicated and has prescribed the frequency and amount of application of such diathermy treatments and the user has been adequately instructed in the method of operating such device by a trained technician.

PAR. 7. The use by the respondent of the foregoing false, deceptive, and misleading statements and representations with respect to its device or apparatus, disseminated as aforesaid, has had and now has the capacity and tendency to, and does, mislead and deceive a substantial portion of the purchasing public into the erroneous and mistaken belief that such statements, representations and advertisements are true and induce a portion of the purchasing public, because of such erroneous and mistaken belief, to purchase the respondent's said device or apparatus.

PAR. 8. The foregoing acts and practices of the respondent, as herein alleged, are all to the prejudice and injury of the public and constitute unfair and deceptive acts and practices in commerce within the intent and meaning of the Federal Trade Commission Act.

REPORT, FINDINGS AS TO THE FACTS, AND ORDER

Pursuant to the provisions of the Federal Trade Commission Act, the Federal Trade Commission on January 28, 1941, issued and subsequently served its complaint in this proceeding upon respondent, United Diathermy, Inc., a corporation, charging it with unfair and deceptive acts and practices in commerce in violation of the provisions of said act. After the issuance of said complaint and the filing of respondent's answer thereto, testimony, and other evidence in support of and in opposition to the allegations of said complaint were introduced before an examiner of the Commission therefore duly design-

nated by it; and said testimony and other evidence were duly recorded and filed in the office of the Commission. Thereafter, the proceeding regularly came on for final hearing before the Commission on the said complaint, the answer thereto, testimony, and other evidence, briefs in support of the complaint and in opposition thereto, and the oral arguments of counsel; and the Commission, having duly considered the matter and being now fully advised in the premises, finds that this proceeding is in the interest of the public and makes this its findings as to the facts and its conclusion drawn therefrom.

FINDINGS AS TO THE FACTS

PARAGRAPH 1. Respondent, United Diathermy, Inc., is a corporation organized and existing under and by virtue of the laws of the State of New York and having its office and principal place of business at 100 West Forty-second Street, New York, N. Y. It is now, and for several years last past has been, engaged in the sale and distribution of a certain electrical device or apparatus designated as "United Short Wave Diathermy."

PAR. 2. In the course and conduct of its aforesaid business, respondent causes said device or apparatus, when sold, to be transported from its place of business in the State of New York to purchasers thereof located in States of the United States other than New York, and respondent maintains, and has maintained, a course of trade in said device or apparatus in commerce between and among the various States of the United States.

PAR. 3. Respondent's device or apparatus is essentially a portable cabinet containing means for the generation of electrical short waves and the application thereof to parts of the human body by means of insulated electrodes. The electrical energy necessary for the operation of this device is secured by attaching it to the domestic electrical circuits in the user's home, and it has a power output of approximately 160 watts. The device has a means of modulating the power output and a time switch which will automatically limit its period of operation to a predetermined time, such time being subject to the control of the operator. When the two electrodes are applied to the user's body and the device or apparatus put in operation, the passage of the electrical short waves between the electrodes creates heat within the body tissues of the user because of their resistance to the passage of such electrical currents. This device or apparatus is offered for sale and sold to members of the public for use in giving self-administered applications of diathermy in their homes.

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PAR. 4. In the course and conduct of its business as aforesaid, respondent, by means of the United States mails and by various means in commerce, as "commerce" is defined in the Federal Trade Commission Act, has disseminated and is now disseminating, and has caused and is now causing the dissemination of, false advertisements concerning its said "United Short Wave Diathermy" device or apparatus; and respondent, by various means, has also disseminated and is now disseminating, and has caused and is now causing the dissemination of, false advertisements for the purpose of inducing, and which are likely to induce, directly or indirectly, the purchase of said device or apparatus in commerce, as "commerce" is defined in the Federal Trade Commission Act.

Among and typical of the false, misleading, and deceptive statements, and representations contained in said false advertisements disseminated and caused to be disseminated as aforesaid, are the following:

Arthritis alleviated by short wave diathermy. Modern science has given us a great discovery * * * short wave diathermy for the home. A FREE demonstration will convince you, as it has many others, of the pain relieving penetrating heat it produces. Prominent physicians and leading hospitals today approve of short wave diathermy for Arthritis—Bursitis—Neuralgia—Rheumatism—Lumbago—Sciatica—Neuritis—Sinus Trouble. Illustrated booklet mailed on request.

* * * * *

Why Suffer? Relieve Pains of

Rheumatism	Sciatica
Bursitis	Arthritis
Lumbago	Neuralgia
Sinus Trouble	Neuritis

Now, in your own home United Diathermy offers you a new home unit just as efficient as equipment used in hospitals, yet as easy to operate as your radio.

* * * * *

You, too, can get quick relief from rheumatic or muscular pains.

* * * * *

Don't keep on suffering, day after day. Science has found a way to alleviate your agonizing pains * * * a remedy so simple and effective.

Short wave diathermy is being used successfully. Today YOU can alleviate quickly the agonizing pains. Why suffer any longer? The United portable model is as simple and safe to operate as your radio. It is just as efficient as the equipment used in hospitals. In order to prove to you what United Short Wave Diathermy can do for you, we invite you to try it in your own home. Just fill out the coupon and you can have a free trial right in your own home. Mail this coupon today. This offer free to anyone living within 200 miles of New York City.

* * * * *

Short Wave Diathermy Relieved My Leg Pains.

(Picture of woman with device applied to her leg above and below knee.)

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To you who suffer from all forms of Rheumatic discomfort such as arthritis, neuritis, bursitis, lumbago, sciatica, neuralgia, sinus trouble, colds, and rheumatism in all parts of the body, we dedicate this booklet. Short Wave Diathermy—science's latest most amazing achievement—here is a method that accomplishes what it sets out to do—alleviates the pain from all forms of rheumatic and muscular discomfort. United Short Wave Diathermy For Home Use. A new era in self-treatment—a method that is simplicity itself—a method that you can use for alleviation of your pains in the privacy and comfort of your own home. (Short Wave Diathermy) electro magnetic waves (radio waves) are converted into heat that is able to penetrate deeply into the body.

* * * * *

Simple—Efficient—Safe

A safe, simple and effective means to alleviate your pain. No longer do you have to take your clothes off—penetrates even through your shoes. One of the best times to take a United Short Wave Treatment is at night before you go to sleep * * * your body is more receptive to beneficial treatment and retains the heat longer. As you can see in the pictures throughout this booklet, the method of applying the new United Short Wave Diathermy is so simple that anyone can use it safely and effectively.

* * * * *

People everywhere are finding out for themselves * * * that short wave diathermy can alleviate pains due to arthritis, neuritis, bursitis, lumbago, sciatica, neuralgia, sinus trouble, and all forms of rheumatism. Short wave diathermy has the approval of medical men * * * It is used in hospitals and other medical institutions. Short wave diathermy is so simple and so safe, that even a child can use it. * * * Thousands of people have found relief from pain in short wave diathermy. It's safe * * * sure. It's approved by medical authorities. There's no reason why anyone should continue to suffer pain and discomfort. Short wave diathermy is the scientific answer to pain. A good many of us suffer from painful conditions of the shoulders, back, chest, feet, head, arms, knees, and other parts of the body. United Short Wave Diathermy can alleviate these conditions. The modern way of alleviating your pains is with United Short Wave Diathermy.

* * * * *

With United, you can take these Short Wave treatments easily and effectively yourself, in your own home and without the assistance of anyone.

PAR. 5. By the use of statements such as those set out in the preceding paragraph, respondent represents that its device or apparatus known as "United Short Wave Diathermy," when used by members of the general public in the treatment of self-diagnosed diseases and ailments of the human body by individual self-application in the home, is a safe, harmless, and effective means and method for the treatment of rheumatism in its various forms in all parts of the body, arthritis, neuritis, bursitis, lumbago, sciatica, neuralgia, sinus trouble, and colds, and for the alleviation of pain resulting from such conditions.

In truth and in fact respondents' device or apparatus is not safe and harmless, and when used by an untrained person may result in severe burns or other serious injury to health. It is not a competent and effective treatment for acute arthritis characterized by infection, acute bursitis, sinus trouble in which there is a retention of pus, or for any disease or condition involving an acute inflammatory process.

PAR. 6. Respondent's representations concerning its said device or apparatus also constitute false advertisements for the reason that they fail to reveal all of the facts material in the light of such representations, or material with respect to consequences which may result from the use of said device or apparatus under the conditions prescribed or under such conditions as are customary and usual.

The use of respondent's device or apparatus in applying high-frequency electric currents to produce heat in body tissues for therapeutic purposes is a form of treatment powerful enough to do serious injury to the user if improperly applied. Such a machine or device, when used unskillfully, will burn or otherwise seriously damage the person to whom it is applied. The application of such diathermy by an unskilled person, in cases where there are advanced blood vessel changes of the legs (usually characterized by severe pains in the extremities), will, in excess dosage, not only cause serious burns but will lead directly to gangrene and necessitate amputation of the leg. Neuralgia and neuritis are symptoms of some underlying disease or cause, and the attempt to relieve the pains resulting from such conditions by the use of a diathermy device or apparatus such as respondent's without seeking to secure proper diagnosis as to the cause of such pains, may result in fatally delaying the commencement of diagnosis and treatment of the underlying disease or cause. The application of diathermy in any area of the body where appreciation of heat has been impaired or lost may result in serious burns and destruction of tissue, and diathermy is definitely contraindicated in any acute inflammatory process, acute arthritis characterized by infection, acute bursitis, and sinus trouble in which there is a retention of pus.

The safe and intelligent use of a diathermy device or apparatus such as respondent's requires that there first be a complete diagnosis by a competent physician, a determination of whether or not diathermy is indicated, and, if so, the amount of heat to be applied and the placement of the electrodes, control and regulation of the dosage, and preventive measures against burns and tissue destruction. Diathermy is not a safe therapeutic adjunct in the hands of an untrained person for unsupervised home use.

PAR. 7. The use by the respondent of the false, deceptive, and misleading statements and representations set out herein with respect to

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its device or apparatus, disseminated as aforesaid, has had, and now has, the capacity and tendency to, and does, mislead a substantial portion of the purchasing public into the erroneous and mistaken belief that such statements and representations are true, and induces a portion of the purchasing public, because of such erroneous and mistaken belief, to purchase respondent's said device or apparatus.

CONCLUSION

The aforesaid acts and practices of the respondent are all to the prejudice and injury of the public, and constitute unfair and deceptive acts and practices in commerce within the intent and meaning of the Federal Trade Commission Act.

ORDER TO CEASE AND DESIST

This proceeding having been heard by the Federal Trade Commission upon the complaint of the Commission, the answer of respondent, testimony, and other evidence in support of and in opposition to the allegations of said complaint taken before an examiner of the Commission theretofore duly designated by it, briefs filed herein, and oral arguments by counsel, and the Commission having made its findings as to the facts and its conclusion that said respondent has violated the provisions of the Federal Trade Commission Act:

It is ordered, That respondent, United Diathermy, Inc., its officers, representatives, agents, and employees, directly or through any corporate or other device, in connection with the offering for sale, sale, or distribution of an electrical device or apparatus designated as "United Short Wave Diathermy," or any other device or apparatus of substantially similar character, whether sold under the same name or under any other name, do forthwith cease and desist from directly or indirectly disseminating or causing to be disseminated, by means of the United States mails, or by any means in commerce, as "commerce" is defined in the Federal Trade Commission Act, any advertisement concerning the electrical device or apparatus designated "United Short Wave Diathermy;" or disseminating or causing to be disseminated any advertisement, by any means, for the purpose of inducing, or which is likely to induce, directly or indirectly, the purchase in commerce, as "commerce" is defined in the Federal Trade Commission Act, of the electrical device or apparatus designated "United Short Wave Diathermy," which advertisement:

1. Represents, directly or through inference, that said device or apparatus is safe or harmless;

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2. Represents, directly or through inference, that said device or apparatus has any therapeutic value in the treatment of arthritis characterized by infection, bursitis where the condition is acute, sinus trouble in which there is a retention of pus, or any disease or condition involving an acute inflammatory process;

3. Represents, directly or through inference, that said device or apparatus constitutes a competent or effective treatment for rheumatism, arthritis, neuritis, bursitis, lumbago, sciatica, neuralgia, sinus trouble, or colds, or for the alleviation of pain resulting from any of said disorders or ailments, unless such advertisement is specifically limited to those cases of such disorders or ailment which do not involve acute inflammatory processes;

4. Fails to reveal clearly, conspicuously, and unequivocally that said device or apparatus is not safe to use unless and until a competent medical authority has determined as a result of diagnosis that the use of diathermy is indicated and has prescribed the frequency and rate of application of such diathermy treatments and the user has been thoroughly and adequately instructed by a trained technician in the use of such diathermy device or apparatus.

It is further ordered, That the respondent shall, within 60 days after service upon it of this order, file with the Commission a report in writing setting forth in detail the manner and form in which it has complied with this order.

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Syllabus

IN THE MATTER OF

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