

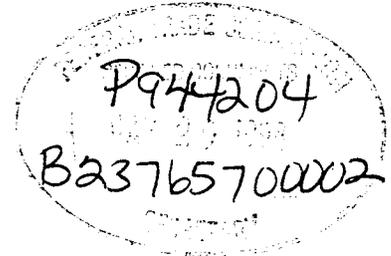
Mid-Atlantic Cleaners and Launderers Association

an International Fabricare Institute affiliate
Serving members in The District of Columbia, Maryland, Virginia, and West Virginia

ORIGINAL

7430 Little Chatterton Lane
King George, Virginia 22485

May 27, 1998



Secretary, Federal Trade Commission
Sixth and Pennsylvania Avenue, N. W.
Washington, D. C. 20580

RE: 16 CFR Part 423 - Care Labeling Rule - Comment

We have examined the proposed rules as set forth in 16 CFR Part 423 and offer the following comments and observations.

Regarding washing instructions: We encourage and support the inclusion of both washing and drycleaning instructions if both are appropriate with the manufacturer responsible for the legitimacy of the testing procedures.

Regarding a new wetcleaning definition: Even though this new technology is daily evolving, we support the FTC position of allowing a professional wet clean instruction along with a conventional care instruction. While we recognize such an instruction may be somewhat premature, we think inclusion of a federal rule now will ultimately serve to push those engaged in the professional textile care industry towards more quickly recognizing the ultimate importance of incorporating new cleaning technologies.

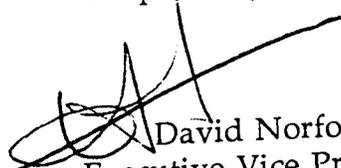
Regarding reasonable basis: We support changes regarding reasonable basis which amends the standard to make clear that the reasonable basis requirement applies to the garment in its entirety rather than to each of its individual components. We think this redefined basis will serve to insure designers and manufacturers are substantially more careful and practical in their selection of design elements and the inherent appropriate testing procedures. Currently, professional textile care professionals and consumers are too often challenged by some component part which simply cannot withstand the specified care label processing procedure.

Regarding water temperature changes: We support inclusion of the already changed definitions as used by AATCC except for the "hot" definition. Rather, we suggest that the proposed definition of "hot" be further modified to include a range of 52 degrees C to 145 degrees F. It is our belief that manufacturers, especially those who manufacture bed linens and shirting materials, already test in water up to 150 degrees before placing care labels on items most commonly associated with

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commerical laundering procedures. We do not support the addition of a "Very Hot" category. It's just too confusing and impractical.

Respectfully submitted,



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