

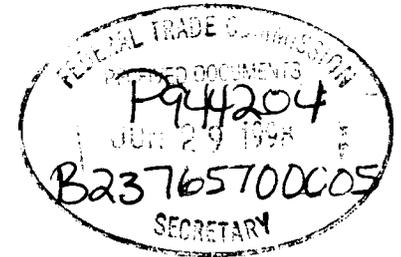
✿ J.R. Viola

Cleaners

June 26, 1998

ORIGINAL

To: Secretary, Federal Trade Commission
 From: J. R. Viola, J. R. Viola Cleaners
 Re: 16 CFR Part 423--Care Labeling Rule--Comment



Please consider the following before making a decision on 16CFR Part 423--Trade Regulation Rule.

1. This rule change will have a significant economic impact on the Dry Cleaning Industry. It will eliminate the option of Dry Cleaning an item, even if Dry Cleaning is required for a satisfactory job. Also it will cause an increase in garment testing and inspecting and reading of all labels. This information will have to be discussed with all customers because they are expecting dry cleaning. The amount of time for the above will be considerable, and this time loss spread out over the entire Dry Cleaning Industry will result in millions of dollars additional expense daily. Our customers come to us to have their clothes dry cleaned. Let the customer decide by giving them the option of wash or dry clean if a garment can be treated either way.

2. The EPA wants to reduce the use of solvent, save customers dollars, and help manufacturers reduce testing. Over the past ten years the Dry Cleaning Industry has decreased the solvent use by almost 80%. If the idea is to keep harmful chemical out of the environment then this new rule will defeat that purpose. By encouraging consumers to home wash articles instead of dry cleaning you will be allowing them to dispose of harmful chemicals by way of their sewer system. Being located in a drought stricken area water is a valuable commodity and should be used sparingly. Home washing will increase the average home owners water usage, thus depleting our water supply. If the untrained consumer does the washing, the water supply will dwindle and water contamination will increase due to chemical disposal. Also, the number of claims sent from consumers to the retailer will increase dramatically because faulty labeling or mistakes made by untrained consumers in stain removal attempts.

There are three types of stains:

1. water soluble
2. solvent soluble
3. chemical soluble

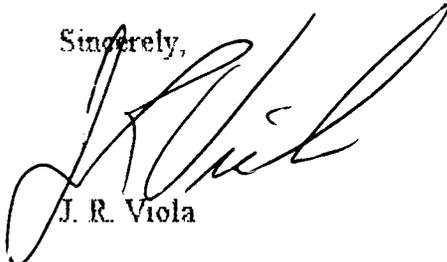
The washing still has to be done and these stains can be on any garment. Wouldn't it be better to have the professional dry cleaner collect and dispose of the waste through the stain removal process, rather than have consumers apply chemicals to remove stains then wash all of the elements into the sewage system? You have control over the dry cleaner but not the consumer.

3. Professional wet cleaning will require a large investment in machinery. This procedure is unproven and as of yet is not accepted by the consumer. Let the market place determine when this procedure is necessary. The comment "this will be cheaper because the dry cleaner adds \$.50 per item" is wrong. The laundry also has the environment to protect. If there is an environmental surcharge it will be the same for both dry cleaning and laundry.

4. Labels should be complete and correct, including both dry cleaning and laundry procedures. In many cases the customer will want their clothing dry cleaned even though the label states "washable". Someone is going to have to take responsibility for going against the label, either the dry cleaner or the customer. This takes additional time and expense.

In conclusion, this new labeling rule will effect the Dry Cleaning Industry, its employees, and the environment in a negative fashion. The EPA does not want to hurt any of the above, but will do so if this rule is passed.

Sincerely,



J. R. Viola