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July 24, 1998

Mr. Donald Clark
Secretary
Federal Trade Commission
Sixth and Pennsylvania Ave., N.W.
Washington D.C. 20580

Dear Secretary Clark:

I am writing in response to the Federal Trade Commission rulemaking to amend its Trade Regulation Rule on Care Labeling of Textile Wearing Apparel and Certain Piece Goods ("The Care Labeling Rule"). Cleaner By Nature is a professional wet cleaning business. We clean nearly every garment we receive in a professional wet cleaning process. Less than one percent of garments are sent out for dry cleaning, usually for extensive grease stains or because of concern about dye bleed. We are currently cleaning over 7000 garments per month.

I have read the comments submitted to you by Robert Gottlieb and Peter Sinsheimer of the ULCA/Occidental College Garment Care Project. I am in agreement with those comments. I want to reiterate the danger of making labeling for Professional Wet Cleaning optional only. By creating the Professional Wet Clean instruction, it creates the appearance that all garments are being tested for cleanability in both the wet cleaning and dry cleaning processes. Consumers and cleaners will falsely assume that a garment labeled "Dry Clean" or "Dry Clean Only" can not be professionally wet cleaned. This will cause cleaners and consumers to dry clean more than is necessary, which is contrary to the goal of minimizing the use of dry cleaning solvent.

Please feel free to contact me if you have any questions, or if I can provide any information to you about professional wet cleaning.

Sincerely,

Deborah Davis
Owner/Partner

FEDERAL TRADE COMMISSION
OFFICE OF THE SECRETARY

TRANSMITTAL SLIP

JUL 30 1998

TO:

Constance Vecellio

S-4302

Please prepare reply for Secretary's signature

Let's discuss

Review/Comment

Recommendation

FROM:

Patricia Jones
Document Processing
Section

DATE: 7/29/98

Information

What's the story?

Please take care of this

Note and file

REMARKS: Review of Care Labeling Rule

Comment(s) # 10-19

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