

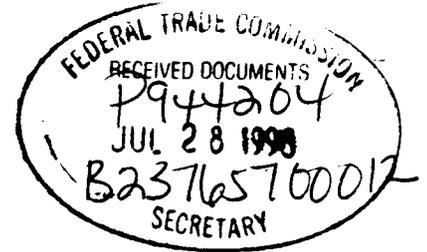


# INTERNATIONAL FABRICARE INSTITUTE

The Association of Professional Drycleaners and Launderers

July 24, 1998

Secretary  
Federal Trade Commission  
6<sup>th</sup> & Pennsylvania Ave NW  
Washington, DC



Re: 16 CFR Part 423 - Care Labeling Rule - Comments

To Whom It May Concern:

The International Fabricare Institute (IFI) is a worldwide trade association representing drycleaners, launderers and wetcleaners. IFI's membership represents approximately half of the nation's estimated 30,000 fabricare specialists.

IFI will address each of the proposed revisions to the Care Labeling Rule since all, if enacted, will have a profound impact on its membership.

### Home Washing Instructions

The FTC is proposing that all care labels give washing instructions when appropriate. This revision is based primarily on the Commission's assessment that not providing washing instructions is an "injustice" to consumers. IFI agrees that consumers should know and be given options as to how to care for their garments. That is why IFI has always supported alternative labeling—providing all appropriate methods of care. Because isn't not providing drycleaning instructions when appropriate an injustice to those consumers who wish to have a professional care for their garments?

Textile manufacturers argue that alternative labeling would add to the cost of garments because of increased testing costs. We would challenge that testing costs would be relatively small when divided across the total number of garments produced per style. As to the point that it would increase solvent usage significantly that would only be true if consumers preferred drycleaning over home care which is contrary to what the FTC believes. Solvent usage due to testing would increase only slightly because testing is not required to establish reasonable basis. And even if testing was required, which we certainly support, solvent used during testing is recovered and reused.

Additionally, there are consumers who want some of their washable items drycleaned. A prime example of these types of garments are men's chinos or black cotton slacks. These items are taken to the drycleaner not just because of the pressing but because the finish and the dye is retained.

Providing all appropriate methods of care serves all consumers—those that want to save the expense of having professional care for their garments and those that want the convenience or appearance of having a professional dryclean their garments.

### Wetcleaning

IFI's position on wetcleaning is that most fabric care plants can process 30-40% with minimal difficulty, and 60-80% with training, skilled labor, and specialized equipment and chemicals. This position mirrors that of CNT and is validated by IFI studies and other independent, well-run studies.

The percentage of wetcleaning a plant can achieve is increased by the commitment of an individual to maximize their plants wetcleaning capabilities. With a very high commitment, a plant may achieve higher than 80% wetcleaning.

Today, the fabricare industry is practicing many forms of wetcleaning which range from hand washing to the mechanized equipment required under the FTC definition. That specialized equipment averages \$30,000-\$35,000, a cost which is quite substantial to a small business who averages \$200,000 in revenue according to the 1992 U.S. Census.

There are no standard test methods by which textile manufacturers can determine if wetcleaning is appropriate. Nor is there any previous knowledge or experience to base a judgment upon since wetcleaning is a new technology.

For these reasons—lack of standardized testing, less than 100% replacement, IFI supports the FTC proposal to require either washing or drycleaning instructions in addition to wetcleaning instructions. FTC's proposed definition, although limiting, is definitive and will provide a standardized basis for testing requirements. IFI would not support stating specific equipment on the labels. This requirement is appropriate today but in time, if and when wetcleaning becomes more prevalent and more standardized, wetcleaning could be a stand alone care instruction.

### Reasonable Basis

IFI supports the proposal that the care instructions apply to the garment in its entirety rather than to individual components. As IFI's garment analysis statistics repeatedly show, garment damage frequently occurs due to failure of the trim during cleaning. A portion of the total number of

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garments received in IFI's Garment Analysis, year after year, are due to trim/component failure. This requirement is certainly a step in the right direction but it is not enough. IFI would still like to see the reasonable basis requirements strengthened. Without a strong reasonable basis, the Care Labeling Rule has no backbone. The FTC is aware of the number of garments IFI receives in its Garment Analysis laboratory--nearly 21,000 in 1997 and the overwhelming majority--39%-- are damaged because of inappropriate or incomplete care labeling.

The damage that results from improper care labeling is easily preventable. A case in point is damaged due to solvent-soluble dyes, prints or sizings which accounted for approximately half of the damaged garments received in 1997 due to improper care labeling. On those garments, the care label recommended drycleaning but after drycleaning color loss occurred or the appearance was altered because some component of the finish or dye was soluble in solvent. If the manufacturer had tested the garment, this type of damage would have been prevented, as would any of the damages which result from inaccurate care labels.

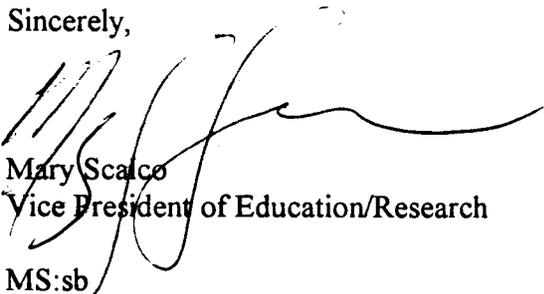
#### Water Temperatures

Consumer practice is to send men's dress shirts out to be commercially laundered and pressed. The majority of these shirts have care labels stating "Machine wash warm, cool iron". Commercial laundering is done at temperatures in excess of 145°F so the very, very hot label would not apply even if manufacturers would use it. And if current practice is any reflection, they will not use it.

The proposed water temperature revision does reflect current trends in home water temperatures but they do not correlate to current consumer behavior and their use of professional laundering.

The FTC receives statistics from our Garment Analysis laboratory on a monthly basis. If you need any further information or more detailed information regarding these statistics, please contact me at extension 131.

Sincerely,



Mary Scalco  
Vice President of Education/Research

MS:sb