

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

"16 CFR Part 423 - Care Labeling Rule - Comment"

Dear Sirs:

After reading the Rules and Regulations dated February 6, 1997, I thought that the water temperature issue had been finalized. I have been passing out, on my own as an appliance service technician, the ASTM Guide, modified sample enclosed, telling customers that everything was now going to be labeled with water temperature degrees per the F.T.C. rules. I have explained that an educational campaign was going to be launched within the eighteen months after the effective date of July 1, 1997.

I am very concerned that the only activities that I have seen in this regard are the chart from Maytag, copy enclosed, that you referred to in the proposed rule notice dated May 9, 1998, and General Electric, Whirlpool, and Maytag coming out with upper end machines having either thermistor or thermostatically controlled water valves. There has been no real information to the consumer as to why these features are important. Sears, on their television ads about washability, does say, in fine print, "with automatic temperature control."

I still feel it is important to show the low end of the cold temperature range, as we here in the northeast, go below the 65 degrees in our water supplies.

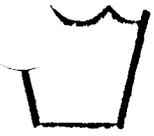
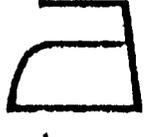
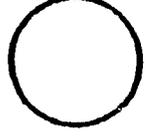
Under Part E - Regulatory Analysis you seem to have left out the benefits to the consumer such as lower drying costs, cleaner clothes, longer lasting clothes, and fewer rash and allergy problems that cause visits to doctors.

I would like to be part of the public workshop to personally discuss the issues raised in this Rule, as long as the distance is not prohibitive.

In closing, the easiest way to educate the public would be to have the temperature degrees listed along with the words on use and care labels, on packages of detergents, and in an obvious spot on owner's manuals of machines.

Yours truly,  
*Bruce W. Fifield*  
 Bruce W. Fifield

# ASTM GUIDE TO CARE SYMBOLS

 <p>Wash</p>	<p><b>Machine wash cycles</b></p>  normal  permanent press  delicate / gentle  hand wash <p><b>Water temperatures (maximum) symbol(s)</b></p> <table border="1"> <tr> <td colspan="2">***** Hot *****</td> <td colspan="2">***** Warm *****</td> <td colspan="2">Cold</td> <td>Canadian / European</td> </tr> <tr> <td>(200F)</td> <td>(160F)</td> <td>(140F)</td> <td>(120F)</td> <td>(105F)</td> <td>(85F-85F)</td> <td></td> </tr> <tr> <td>95C</td> <td>70C</td> <td>60C</td> <td>50C</td> <td>40C</td> <td>30C</td> <td></td> </tr> <tr> <td>●●●●●</td> <td>●●●●</td> <td>●●●●</td> <td>●●●●</td> <td>●●●</td> <td>●●</td> <td>●</td> </tr> <tr> <td colspan="2">Hot</td> <td colspan="2">Warm</td> <td colspan="2">Cold</td> <td>American</td> </tr> </table>	***** Hot *****		***** Warm *****		Cold		Canadian / European	(200F)	(160F)	(140F)	(120F)	(105F)	(85F-85F)		95C	70C	60C	50C	40C	30C		●●●●●	●●●●	●●●●	●●●●	●●●	●●	●	Hot		Warm		Cold		American	<p><b>Warning symbols for laundering</b></p>  do not wash  do not bleach  do not dry (used with do not wash)  do not iron
***** Hot *****		***** Warm *****		Cold		Canadian / European																															
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●●●●●	●●●●	●●●●	●●●●	●●●	●●	●																															
Hot		Warm		Cold		American																															
 <p>Bleach</p>	 any bleach when needed  only non-chlorine bleach when needed	<p><b>Additional instructions (in symbols or words)</b></p>  do not wring  do not tumble dry																																			
 <p>Dry</p>	<p><b>Tumble dry cycles</b></p>  normal  permanent press  delicate / gentle  line dry / hang to dry  drip dry  dry flat <p><b>Tumble dry heat setting</b></p>  any heat  high  medium  low  no heat / air	 In the shade (added to line dry, drip dry, or dry flat)  no steam (added to iron)																																			
 <p>Iron</p>	<p><b>Iron-dry or steam</b></p>  maximum temperature 200 C (390 F) high  150 C (300F) medium  110 C (230 F) low	<p><b>Dryclean - additional instructions</b></p>  short cycle  reduce moisture  low heat  no steam finishing																																			
 <p>Dryclean</p>	<p><b>Dryclean - normal cycle</b></p>  any solvent  any solvent except trichloroethylene  petroleum solvent only	 do not dryclean	<p><b>Dryclean - additional instructions</b></p>  short cycle  reduce moisture  low heat  no steam finishing																																		

Note: This figure illustrates the symbols used for laundering and drycleaning instructions. As a minimum, laundering instructions include, in order, four symbols: washing, bleaching, drying, and ironing, and, drycleaning instructions include one symbol. Additional symbols or words may be used to clarify the instructions.

ASTM D5489-96c FIG. 1 Commercial and Home Laundering and Drycleaning Symbols

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\* Typed in information obtained from Federal Register "16 CFR Part 432"

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# LAUNDRY WATER TEMPERATURE GUIDE

White Items  
Diapers  
Underwear  
Heavily Soiled,  
Colorfast Items

120° —  
140°F

Most Items

85° —  
105°F

ONLY Very  
Bright Colors  
with Light  
Soil

65° —  
75°F

50° — 60°F

Too Cold  
for  
Detergents

NOTE:  
Care Labels  
and Detergents  
Define Cold  
Water as  
80° - 85°F