

BÖWE **PERMAC, INC.**

Your Garment Care Specialist For The World

August 14, 1998

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



"16 CFR Part 423 – Care Labeling Rule – Comment,"

Please consider the following when defining Wetcleaning. I was asked to forward to you by Dr. Manfred Huppertz of Buesing & Fasch GmbH & Co. Oldenburg, Germany. Dr Huppertz was involved in developing and defining wetcleaning as it is done in Europe.

The wet clean process is a way to clean every kind of outer wear in water on a wide basis. Working methods are adapted to the kind of textiles by a combination of Temperature, Mechanics, Time, and Chemicals. It is necessary to refer especially to the color fastness of the textiles (according to ISO105 A03 and ISO 105 A02) and to the shrinkage - which is not allowed to go beyond +/- 2% - of the single components of the clothes.

From GENITEX an international care labeling has been passed, which defines the wet clean process exactly:



normal outer wear



Sensitive outer wear



very sensitive outer wear

For each three levels of sensitivity in the wet clean process exact defined processes are written down. Each garment must pass through the appropriate process five times undamaged to qualify for the care labeling.

Sincerely,

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