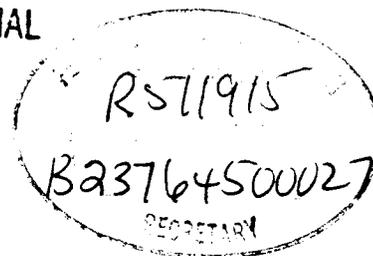


ORIGINAL

**TERRY SPEAR, CED  
SPEAR CLEANING & LAUNDRY  
5637 MILITARY PKWY.  
DALLAS, TEXAS 75227  
214-381-5324  
FAX 388-4922**



February 23, 1999

Secretary  
Federal Trade Commission  
6<sup>th</sup> & Pennsylvania  
Washington, DC 29580

Re: 16 CFR Part 423-Care Label Rule

I would like to start by saying that I appreciate the opportunity to comment on this matter. I have been in the Dry Cleaning & Laundry business in the Dallas area for 20 years. We have A central plant with 19 drop stations and will do in excess of \$1 million in sales this year. Of all the clothes that we have problems with, or have to spend extra time with, the ones with improper care labels consume the majority of our time.

I have found that most of my customers trade with us because of convenience, and even if their clothes could be processed at home, they choose not to take the time and effort to process them at home. Some customers that do their clothes at home, bring their problem clothes or clothes with spots they can't get out to us, and that is where the problem begins.

When I started in business, 20 years ago, the clothes were required to have all the approved methods of cleaning listed on the care label. If the piece of clothes was normally washed, and a spot or stain did not come out, you could look at the care label and see if it were Dry Cleaning approved, and use that method to try and remove the stain. On the other hand if it was normally Dry Cleaned, some times washing was the answer. The end result was that with the information the care label gave us, we could use the proper procedure to remove the stain, and the customer was happy, and that is what keeps the customers coming back.

When the rules changed and the manufactures were only required to put one approved method of cleaning, is when all the problems started. When we came upon a problem stain that Dry Cleaning would not take out, we would use our best judgement and wet wash some items, but the dye was not color fast to water, and you had a damaged item that you had to buy. Within a matter of a few years many of the manufactures were making items that could only be wet cleaned, or only Dry Cleaned, but with the current label rules, they were not required to tell you. So if you had a problem spot, you were afraid to try anything else with the fear of having to buy a damaged item, or you were faced with an unhappy customer because the spot did not come out, and that is a No Win Situation !!

I know that it less expensive to produce a piece of clothes that contains dyes that can be Wet washed, or Dry Cleaned, but the consumer needs to know what they are getting into. I think that the consumer needs full disclosure on how the garment is to be cared for, so they can make an informed choice on what they are getting.

I think it should be required that manufactures furnish multiple care procedures on all garments, and the cost would be pennies per garment.

This required labeling puts us on the same level as other European communities that already provide this service for their consumers.

I know that the EPA's stand on Dry Cleaning is not good, at it's best, but I do not think that their unproven mission should effect the FTC on it's long range goal to give the consumer the needed information that a multiple care label would give.

Dry Cleaners have been recycling long before it became the proper thing to do, and with the new drycleaning machines that have the ability to recover 99.5% of the solvent used, is an even better reason for the consumer to have the needed information to make that choice when they buy their next new garment.

I think the verdict is still out on the new Wetcleaning procedures, and will be years before we know all the facts, but a lot of additional chemicals are added to the washing procedure, where as 99.5% of the cleaning solvent is re-usable when items are dry cleaned.

I am in support of alternative labeling, labeling for all appropriate methods of care, and I do appreciate the opportunity to give my input, and would ask for an extended period so that the cost of alternative labeling can be looked into, and to also find out why some of my fellow drycleaners who have written letters to the FTC months ago do not show up as being received.

Sincerely,

A handwritten signature in cursive script that reads "Terry Spear". The signature is written in black ink and is positioned below the word "Sincerely,".

Terry Spear, CED