

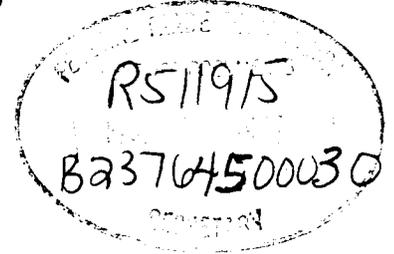


Aqua Clean System™

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ORIGINAL



March 1, 1999

Mr. Donald Clark, Secretary
 Federal Trade Commission
 Sixth & Pennsylvania Ave. NW
 Washington, DC 20580

RE: 16 CFR Part 423 - Care Labeling Rule

Dear Mr. Clark:

Aqua Clean Systems is the leading supplier of professional wetcleaning equipment in North America. We were not in attendance at the Federal Trade Commission's January 29, 1999 Workshop/Conference concerning the proposed amendment to the Care Labeling Rule. However, in the past we have provided comments to the FTC on the Care Labeling Rule, and would like to make some comments in favor of the amendment, which would permit a "Professionally Wetclean" instruction label to be placed on certain garments.

Since its formation in 1994, there have been over 450 Aqua Clean wetcleaning systems installed to date. The number of wetcleaning systems installed is growing, especially in light of the introduction of our small Mini System last year. There is no doubt that sales of wetcleaning equipment would increase significantly if the FTC required the addition of a "Professionally Wetclean" label in the appropriate garments. Merely allowing the manufacturer to include such a label would result in very little compliance. Allowing, as opposed to requiring, such a label would result in an amendment to the Care Labeling Rule that would be nothing more than a toothless tiger.

Aqua Clean Systems has previously submitted to the FTC a definition of "Professionally Wetclean," i.e., that "machine wetcleaning is different from washing in that it requires sophisticated commercial equipment, special nonhazardous chemicals, and technical knowledge on the part of a skilled fabric cleaner." No further information is needed, since cleaning professionals are trained to select the correct wetcleaning formulas, based on fabric content, just as they do when drycleaning. Furthermore, the term "wetcleaning" should be used instead of "washing," since washing will mislead the consumer into believing that the garment can be hand-washed at home. A "Hand Wash" label must be separate and distinct from a "Professionally Wetclean" label.