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ORIGINAL

MFG:mb

20th May 1998



“16 CFR Part 423-Care Labelling Rule”

The Secretary,
Federal Trade Commission
Sixth and Pennsylvania Avenue, N.W.,
Washington DC 20580
U.S.A.

Dear Sirs,

I would like to make the following comments on the notice of proposed rule making.

To firstly answer the questions posed in the notice:-

1. The anecdotal evidence concerning consumer interpretation of a drycleaning instruction is, I believe, not necessarily that a garment cannot be washed, but rather that if the garment is drycleaned it will maintain a satisfactory appearance for a longer time over a larger number of cleaning cycles.
2. In the current state-of-the-art there are relatively very few businesses providing professional wetcleaning in the U.S.A.- in the order of 100. Current predictions indicate that this number will increase, but only at a relatively slow rate.
3. Given the small number of businesses offering professional wetcleaning, a garment that was labelled with care instructions indicating that it was only to be professionally wetcleaned would place consumers at a huge disadvantage, and it would be very valuable to insist that another cleaning instruction also be provided.
4. In our extensive experience, both in the U.S.A. and the U.K. where we run a total of approximately 1,000 drycleaning units, a high proportion of garment failures are attributed to trimmings or other ornamentation affixed to garments. Whilst testing or knowledge of individual components of a garment is a valuable precursor to the preparation of a garment suitable for any given form of aftercare, it is our strong belief that there is no substitute whatsoever for “cleanability” testing of a fully constructed garment. In the context of the volumes of garment sales and the profit margins which are frequently obtained, the cost of testing, I would submit is, in reality, trivial.

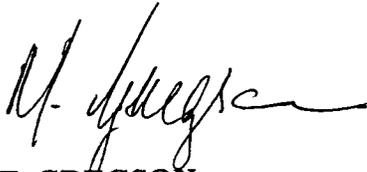
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“16 CFR Part 423 - Care Labelling Rule”

We note the comments in the proposed rules given by the Consumers Union, that assert that the rules should specify test methods relating to consumer expectations assessing product performance after repeated cleaning. With regard to the proposal that all garments which are suitable for home washing must be so labelled, we believe that it is very important that appropriate criteria are developed specifying the product performance after a given number of cleaning cycles commensurate with the reasonable expectations of the life of the garment. The basis for this comment is that, whilst very many garments are suitable for home laundering this may frequently only be for a limited number of cleaning cycles, whereas in professional garment cleansing techniques garments frequently will exhibit a much longer useful lifetime. We would consider it extremely important, from the consumer's point of view, to ensure that testing does give a true indication of the lifetime of serviceability of a garment to the consumer, and does not lead the consumer into an erroneous impression that garments are suitable for home laundering when this will only shorten their lifetime, in some cases quite dramatically.

I hope the above comments are helpful to you, I would appreciate receiving details of the Public Workshop which is planned to be held on a date to be decided.

Yours faithfully,



M.F. GREGSON
GROUP TECHNICAL DIRECTOR