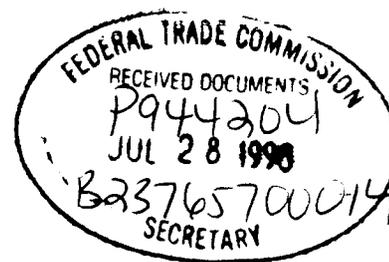




National Association of Hosiery Manufacturers

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July 23, 1998

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

Re: 16 CFR Part 423 - Care Labeling Rule - Comment

The National Association of Hosiery Manufacturers is the trade association representing the interests of those companies in the United States that produce all types of men's, women's and children's hosiery. Our members produce and/or market approximately 90% of all hosiery sold in this country. We are pleased to have the opportunity to submit comments on the proposed rulemaking to amend the care labeling of textile wearing apparel. Questions were posed in three areas (1) requiring instructions for cleaning in water; (2) the reasonable basis requirement of the rule; and (3) definitions of water temperatures. We will deal with each one separately.

Requiring Instructions for Cleaning in Water (labeling for home washing):

Most of these proposed changes deal with notification requirements for dry cleaning (professional wet cleaning), which are not directly applicable to hosiery products. Dry cleaning and professional wet cleaning are unnecessary for hosiery and therefore not referenced on our care label instructions. These instructions are considered home washing instructions and no reference to the other methods should be required. Both home washing and finishing processes can be accomplished for hosiery products by the average consumer at home.

The Reasonable Basis Requirement of the Rule:

We agree with the Commission and its proposed amendment to clarify that the reasonable basis requirement applies to the garment in its entirety rather than to each of its individual components. This is how we have been interpreting the requirement in the past. The reasonable basis standard requires reliable evidence, and we feel the current standard specifies adequately what these can and should be and that the requirement of specific testing is not justified in increased costs to the consumer for hosiery.



Definitions of Water Temperature:

Some hosiery products may be washed by machine, whereas others should be washed by hand because of the delicate nature of the fabric. The water temperature is not the issue. For those products that can be washed by machine, and where water temperature should be designated in terms such as cold, warm, hot or very hot, we support the temperature ranges as defined by AATCC. We agree with the Commission that it is not necessary to require that precise temperatures be listed on care labels. We also agree that where no temperature is designated that the inference is that the garment can be washed successfully at any temperature.

However, for those items that should be "hand washed only", because of the delicate nature of the fabric, we feel that only cold or warm water should be used in order to protect the consumer from injury. We believe the average consumer would not scald themselves purposely during the hand wash method, and that a designated hand wash requirement would naturally imply cold or warm water only. Consideration might be given to referencing this assumption under "washing - hand methods in the regulation but not required on the care label."

NAHM is pleased to have had the opportunity to submit these comments. If we can provide additional information, please do not hesitate to contact us.

Regards,



Sid Smith
President and
Chief Executive Officer

SS:jp