



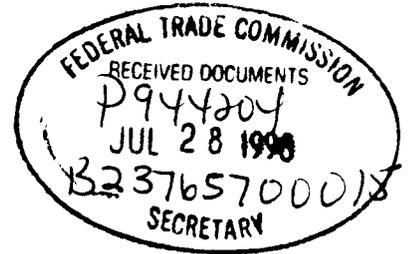
Embassy of Italy
Commercial Office

005549

1601 Fuller St. N.W.
Washington, D.C. 20009

July 22nd, 1998

Secretary
FEDERAL TRADE COMMISSION
Sixth & Pennsylvania Ave. N.W.
Washington, D.C. 20580



Dear Sir,

Re: ``16 CFR Part 423 Care Labeling Rule - Comments''

With reference to the request for public comments published in the Federal Register of May 8, 1998 concerning the above, please find enclosed the observations of the ``Associazione Serica'', a member of the Italian Federation of Associations of Textile and Clothing Industries (FEDERTESSILE).

Please note that the enclosed comments refer mainly to the Italian market and to the Italian/European consumers.

Sincerely,

Luigi Marras
Counselor for Economic
and Commercial Affairs

Encl.

We refer to the notice of proposed rulemaking, published on the Federal Register Vol. 63, No. 89 of Friday, May 8, 1998 (16 CFR Part 423 "Trade Regulation Rule on Care Labeling of Textile Wearing Apparel and Certain Piece Goods") and to the Federal Trade Commission's invitation to answer the questions listed on page 25428. The Italian Silk Manufacturer's Association (Associazione Serica), which is a member of our Federation, would like to reply to the a.m. questions as follows:

A - Requiring Instructions for Cleaning in Water

1) Is there empirical evidence regarding ?

Answer: yes, there is. This instruction is considered as a prohibition to use other washing methods.

2) How many domestic businesses ?

Answer: 30 % (estimate)

3) Should the Rule provide ?

Answer: No, it should not. Other possible cleaning instructions should be allowed.

B - The Reasonable Basis Requirement of the Rule

4) Would the amendment ?

Answer: yes, it should. A clarification would be advisable.

C - Definitions of water temperatures**5) How can consumers best be made aware ?**

Answer: It is suggested to harmonize the US labeling system with the ISO/GINETEX one. In the European system the pictograms indicate also the bath temperature in degrees centigrade (°C)

Do consumers need to determine ?

Answer: the indication of the corresponding temperature (in degrees) will provide an additional and reliable reference.

Consumers need to know the recommended temperatures to select the optimal washing programmes offered by their washing machines.

6) Would consumers understand ?

Answer: It is suggested that the descriptor "very hot" is associated to a reference temperature.

Note: *above comments are mainly based on European consumers' behaviour.*