nca INTERNATIONAL
A Worldwide Membership Organization of Drycleaners and Associations

NEIGHBORHOOD CLEANERS ASSOCIATION-INTERNATIONAL

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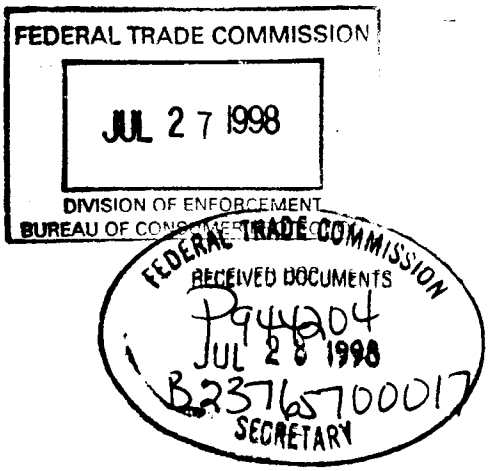
July 24, 1998



Federal Trade Commission
Sixth and Pennsylvania Ave., NW
Washington, DC 20580
Attn: Constance M. Vecellio, Esq.

RE: 16CFR Part 423
Care Labeling Rule - Comments

Dear Ms. Vecellio,

Among the reasons the FTC cites for amending the rule are:

- The EPA's goal of reducing PCE emissions, and
- The consumer's ability to home wash many items that are labeled 'dry clean', thereby saving the consumer money.

Part D
"Definition"
(h) Professional Wetcleaning

FTC's proposed definition is inaccurate, expensive and excessive. The requirement for a computer-controlled washer and dryer may be desirable for very large operations but the average drycleaner could not make the wetcleaning process cost effective if the equipment you propose was a requirement. The fact is that, after over 3 years of the "new" wetcleaning equipment being available, there are less than 200 of these systems in use in the United States.

I have personally inspected garments in 100% wetcleaning facilities using "computer-controlled" equipment and was not very impressed with the quality of the finished product. I have also attended demonstrations sponsored by the wetcleaning machinery manufacturers and have watched their faces turn 'red' when they took damaged garments out of the machines in full view of an interested audience.

In professional wetcleaning, the operator utilizes a knowledge of bleaches, additives and sizings unavailable elsewhere. This knowledge of the chemistry of wetcleaning, as well as an intimate knowledge of fabrics, fibers and dyes is the cornerstone of successful wetcleaning. It is not necessarily the new equipment used to process/clean and dry the work.

Wetcleaning

The information furnished by wetcleaning machinery manufacturers is accurate as far as it goes. It should, however, be noted that any cleaner known to us who is doing more than 30% of their annual volume (especially in the Northeast) wetside, is equipped with special finishing equipment as well as cleaning and drying equipment.

The FTC must be very careful, if it plans to specify wetcleaning equipment, that it takes into account the very special finishing equipment required. Instead, it must somehow identify that no special finishing equipment is necessary to successfully wetclean a garment. The latter suggestion would dramatically impact on the number of garments that should be labeled "professionally wetclean."

Many cleaners routinely wetclean 30% of their volume. However, only a small percentage of cleaners are equipped with the finishing equipment that CNT and others suggest.

While some garments will withstand home washing care, they will not necessarily have the same life expectancy as they would if they had been professionally drycleaned. This fact was included in a recent NIOSH report that encompassed a study of the German drycleaning and wetcleaning service industry.

In addition, not requiring dual labeling (dryclean/wash) could result in the consumer having to spend more money on their wardrobes long term. This would be due to the excess wear potentially caused by home care.

The FTC should ensure that the long term needs of the consumer are being protected, while the short term goals of environmentalists, machinery manufacturers and detergent manufacturers are being heeded, when it recommends home washing only for garments that might give better service if professionally cleaned.

It has been stated that 90% of all garments can be safely and effectively wetcleaned, with no change in the appearance of wool, silk, rayon and certain other synthetic blends. Our experience indicates that many consumers note unacceptable differences not immediately observed. Customers object to differences of feel, hand and subtle changes in texture and size. There are also seam and binding puckering that is objectionable to the customer.

There are several areas of concern not properly addressed:

Health

The proposed care labeling, in attempting to achieve an objective of less solvent use and drying, will create other problems. The consumer, in doing more home washing, will invariably create these problems.

Detergents need warm water and proper soap to rinse and neutralize chemicals left in the garment. Cold water washing, as stated, does not activate chemicals for proper cleaning, and will not completely achieve a thorough rinsing of chemicals from a fabric. This will cause irritations and allergic reactions to the consumer.

Bleach

Improper additions of detergent and alkali will cause chlorinated bleach to breakdown forming chlorine gas. In addition, chlorine bleach does not rinse out of a fabric and the consumer may be wearing a garment that can be potentially irritating.

Hygiene

In creating labeling for more home washing, we may be leaving a false safety impression with the consumer. Mildew, bacteria, lice, larvae and other microorganisms are not destroyed by cold water washing. It is a well-known fact that microorganisms are destroyed by drycleaning solvent, heat above 140F, and chlorinated bleach.

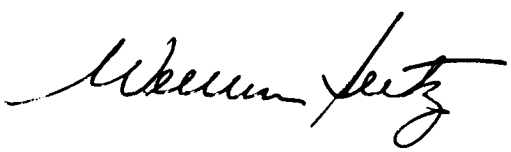
Home Washing Temperatures

While information is a good thing, it would be interesting to learn how many consumers know the temperature of the water being fed into a home or laundromat washing machine on any given setting. How are consumers supposed to know, for example, that the 'cold' water setting in the Northeast during January is too cold for good cleaning? Isn't that an instruction more suitable for the laundry detergent bottle than it is for the garment care instruction?

Reasonable Basis

The reasonable basis rule should, indeed, apply to the entire garment, including trim and other component parts of the garment.. However, forestalling a testing requirement to determine a reasonable basis until a North American labeling harmonization is completed is posing an unfair burden on the American consumer, who is entitled to protection now.

Respectfully submitted,



William Seitz
Executive Director