

# Gap Inc.

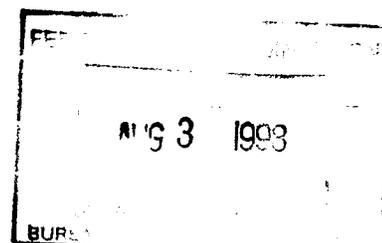
Gap  
Banana Republic  
Old Navy

July 27, 1998



One Harrison Street  
San Francisco, CA 94105  
650 952 4400 tel

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Ms. Constance Vecellio  
Enforcement Division  
Consumer Protection Bureau  
Federal Trade Commission  
Sixth Street and Pennsylvania Avenue, NW, S-4302  
Washington, DC 20580

Dear Ms. Vecellio:

In response to the May 8, 1998, Notice of Proposed Rulemaking on Trade Regulation Rule on Care Labeling of Textile Wearing Apparel and Certain Piece Goods, Gap Inc. has the following comments.

1) Dry cleaning/home washing instructions

The FTC proposes that when a manufacturer markets an item with "dry clean only" or "dry clean" instruction, that they either: 1) also provide home wash instructions if appropriate; or 2) substantiate that home washing would be inappropriate for the garment.

Gap Inc. does not believe that providing both dry cleaning and home wash instructions is practical in all cases. The Company provides care instructions that are most appropriate for the garment per direction from independent laboratory analysis. In some cases, when appropriate, the Company provides both washing and dry cleaning instructions. For other items, however, where the garments would clearly be damaged by home washing/finishing (e.g. a wool blazer), the Company only provides dry cleaning instructions. In cases where a garment is appropriately labeled with dry cleaning instructions only, it would add significant cost and time to the testing process to uniformly substantiate that a garment cannot be home washed. Because testing for both care procedures would require two test samples instead of one, the requirement would double testing cost and time.

2) Allow labeling for professional wet cleaning instructions

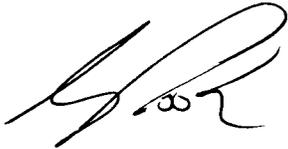
3) Clarify that care instructions apply to the entire garment including trims

4) Make definitions of cold, warm, hot, and very hot water consistent with the American Association of Textile Chemists and Colorists

Gap Inc. is in agreement with these proposals.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Poole', with a stylized flourish at the end.

Gregory I. Poole  
Vice President, Product Standards and  
Quality Assurance