

From: "Nick Agrawal" <nick.agrawal@strus.com>
To: "James G. Mills" <jmills@FTC.GOV>
Date: Mar 4, 1999 12:56 pm
Subject: Re: Public Workshop on Care Labeling Rule

Dear Mr. Mills,

As a follow-up to my voice mail to you from yesterday, please note that STR would like to place following comments on the public record:

Several comments were made during discussion of the dual labeling of garments. These included references to the associated cost of care label testing and the impact this testing might make on the final price of a garment. Specifically, it was noted that testing to determine a care label recommendation would cost in the range of \$300 per garment. Another comment was that manufacturers may be willing to conduct a study to determine how much dual care label testing might add to the cost of a garment.

Specialized Technology Resources (STR) would like to add to verbal comments made by Victor Ovadia and presented at the meeting to include the following:

Specialized Technology Resources (SRT), and ISO 9002 registered firm headquartered in Enfield, CT routinely conducts independent laboratory testing of garments. STR supports the statement that \$300 is a reasonable cost estimate to develop a "care label recommendation" for a normal garment. This would include the testing necessary to determine the care label instruction that best applies to a garment where a care label instruction has not previously been suggested. In contrast, "care label verification" can be performed at considerably less cost. In this case, a garment is tested to determine if a care label suggested for that garment is appropriate.

With regard to the comment asking if garment manufacturers would be willing to conduct a study to determine how much dual care label testing might add to the cost of a garment, STR would be pleased to participate in such a study.