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BY FAX TO: James Mills
Federal Trade Commission
From: Jo Ann Pullen
Date: 2/7/99
Subject: Comments on Public Workshop 1/29/99

Thank you for all your hard work to foster public comment on proposed revisions to the FTC care labeling rule.

I am writing to ensure that comment I made (without using the microphone) is on the record. I suggested action to meet some of the concerns of the emerging professional wet cleaning industry. It was mentioned that fiber information is essential for successful professional wet cleaning decisions. It was also reported that textile fiber information is not required on a permanent label and that certain parts of an apparel item need not be listed (the blazer lining that is not a structural part (?) of the blazer.

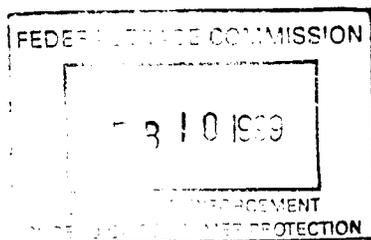
This letter is a formal consumer request to review the Textile Fiber Identification Act and other laws or regulations as needed to ensure the appropriate information is available for the life of the textile item for appropriate care.

I have placed the definition of "professional wet cleaning" on the ASTM D13.62 agenda and will provide the minutes of the meeting to you. The FTC definition seems clearer and easier to link to a test method.

I have also asked Dr. Krueßmann to provide Dr. Riggs with a copy of their test method (not reproducible) so test methods and definitions can be addressed at the February AATCC meeting.

Jo Ann Pullen

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✓ James Mills, Federal Trade Commission
Jerry Tew, AATCC

From: Jo Ann Pullen *Jo Ann Pullen*

Date: February 7, 1999

Subject: Work on Professional Wet Cleaning Definition and Test Method

I am looking forward to some ambitious work on a definition and reproducible test method for evaluating apparel cleaned by a professional wet cleaning process.

My comments at the FTC meeting were driven by the urgency of the need to complete this process. We have been working for several years for a revision of the FTC Care Labeling Rule, The NAFTA Textile Labeling Agreement, the ASTM D5489 Care Symbol Standard, and the ISO 3758 Care Symbol Standard. The expectation is that all these revisions will be done by the end of the year.

These large and possibly irreversible activities are all nearing completion. So, it behooves (1) those universities doing the research, (2) those manufacturers developing the equipment, and (3) those drycleaners using the equipment to quickly develop a reproducible test method that is usable by the apparel manufacturers when preparing a care label. The Project Engineer from Sears said that AATCC and ASTM do not have staff that develop test methods. Volunteer experts develop the tests. In this situation you, the above, are the experts; ASTM and AATCC need you to develop the test and definitions.

Please urge all the experts to attend the appropriate February AATCC meeting (secure time and location from Jerry Tew). Study related test methods (home laundering and drycleaning) to understand the format. Then identify the key wet cleaning information that should be in each section of the draft test method. It would be best if your team does some work in advance of the meeting. I believe Charles Riggs chairs this group and am sure he will be glad to help. Good luck!

I wrote Helmut Krueßmann, a leader in this field and Chair of ISO/TC38/SC11, and asked him to forward a copy of his test method to Mr. Riggs.

The FTC definition and the CNT definition will be discussed at the ASTM D13.62 meeting, and, I assume, at the AATCC Meeting. The FTC definition is focused and may better facilitate a test method.

Please don't hesitate to call if you have questions. I want you to be successful. You may also want to consider hiring a consultant to do the writing for you.