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Mid-Atlantic Cleaners and Launderers Association

an International Fabricare Institute affiliate
Serving members in The District of Columbia, Maryland, Virginia, and West Virginia

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February 24, 1999

Secretary
Federal Trade Commission
6th and Pennsylvania Avenue, N. W.
Washington, DC 20580

RE: 16 CFR Part 423 - Care Label Rule

Mid-Atlantic Cleaners and Launderers Association is a trade association representing approximately 500 members engaged in the drycleaning and laundry industry throughout Maryland, Virginia, West Virginia, and The District of Columbia. On behalf of our members, we urge your adoption of a care label rule that requires labels to include all appropriate methods of care.

Clearly this position should be a slam-dunk decision because: 1) it provides full disclosure to consumers; 2) allows for development of labeling for new textile care methods; 3) it's cost effective; 4) and provides an effective care label similar to that employed throughout Europe.

We are, however, even before offering additional specific comments, very much concerned that a decision for substantially less than full disclosure has already been formulated. Even before the convening of the latest roundtable discussion on January 29, 1999, comments attributed to an FTC official in an article appearing in Woman's Weekly, would seem to support this concern. The time is long, long since passed when the textile maintenance industry will permit itself to be jerked around and jump through hoops just to see an already determined poorly crafted policy implemented.

We believe that a full disclosure policy will require manufacturers to do the right thing, and test garments, findings, and trims, before flooding the market with unserviceable merchandise which, when they fail, because of inappropriate or wrong care labels, make the cleaners, retail outlet, and manufacturer look bad - not to mention the angst caused the owner of the garment!

Q Should the Rule be amended to require a washing instruction for all items that can safely be washed in a home-style washer, even if drycleaning would be an appropriate alternative care method?

A A professional fabric care specialist stands to be a beneficiary of multiple care practice labeling. Although consumers may choose to use home-style washing techniques and equipment as specified on a label, consumers would also know that the article can be refurbished professionally and may choose the professional option as a time saver or in recognition

that home-style washing techniques and ironing fails to provide the stain removal and finished look only a professional can provide.

Q Should a washing instruction be required if the item can be successfully refurbished by washing but its useful life would be extended by drycleaning?

A Consumers routinely request professional services for garments that have a wash label in them because they know from experience that colors don't fade as dramatically in drycleaning as they do in washing, and fabrics do not take on a "worn" appearance so quickly as they do from repeated home-style washing and ironing. Professionally cleaned clothes simply look better and last longer.

We think that consumers want to make informed choices, especially when it comes to the care of their garments. And they want to have some reasonable assurance that the care method(s) on the care label are accurate and keep their garments looking their best for a long time.

Q Should the Commission amend the Rule to permit, or to require a "Professionally Wetclean" instruction?

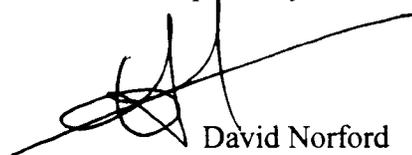
A Yes. We support a wetcleaning care instruction in conjunction with instructions for other established care procedures. Great care must be taken in determining definitions because, even though wetcleaning has been around as long as drycleaning, there are not established test methods and there is not broad based industry knowledge of emerging wetcleaning technology. We're getting there, but we're not there yet. Any definition should not be equipment specific.

Q Should the inclusion of other appropriate care methods be mandatory or optional?

A Full disclosure, by definition, requires the inclusion of all appropriate care methods.

We very much appreciate the opportunity to comment on various amendments to the Rule under consideration. We think the comment should remain open for a period beyond March 1 in order to allow for an appropriately unbiased consumer survey to be completed.

Respectfully submitted,



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