

South Eastern Fabricare Association **SEFA**

ORIGINATED IN 1908



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Thursday, February 25, 1999

Federal Trade Commission
Secretary
6TH & PENNSYLVANIA AVE NW
WASHINGTON, DC 20580

Re: 16 CRF Part 423 – Care Label Rule

The South Eastern Fabricare Association has been serving our member's needs in the southeast (Ga., Al., S.C. & Fl.) since 1908. We provide any and all education, technical, legal and legislative etc. support any and all members may require.

Our organization supports alternative labeling for all appropriate methods of care, because it answers the questions posed by the FTC and upholds FTC's mission. It also allows for the development of labeling for new fabric care methods such as wetcleaning. Most importantly, it provides full disclosure to our customers and the cost is minimal. We are opposed to the Commission limiting care labeling to only one appropriate method of care. Alternative labeling provides full disclosure on how garments can be cared for, which allows the consumer to make informed choices.

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. We believe the real issue is "low labeling" and the desire of some clothing manufacturers to minimize their liability for poor cleanability. Garments labeled "dryclean" may also be washable. This is allowed under the current rule; but in many cases may be "low labeling". There are very few products that do not last longer, retain color better and maintain a like new appearance longer when drycleaned professionally than when laundered at home. Dual or alternative labeling seems the only answer that provides the best information for whomever is doing the cleaning.

Q. Should the commission amend the Rule to permit or to require a "professionally wetclean" label instruction?

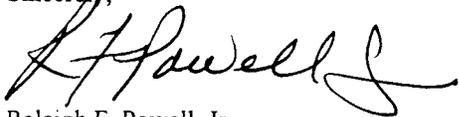
A. Wetcleaning is an emerging technology and the practice has yet to be standardized. Wetcleaning, as practiced in our industry, to date, includes everything from hand washing to computerized equipment to specialized finishing equipment. The textile and garment manufacturers have no means to assess "reasonable basis" for wetcleaning. There are no established test methods and there is no broad-based industry knowledge. Even after a test method is developed, dual or alternative labeling would still be in the best interest of the consumer. Also, the definition should not be equipment specific. As an emerging technology the marketplace should decide the most appropriate equipment. I urge the Commission to not allow or **require** a "professionally wetclean" label at this time.

Our fabricare industry encourages the FTC to keep the record open longer than March 1, 1999. Extending the comment period would allow for data collection the following issues: cost for alternative labeling, accurate assessment of consumer preferences in regards to care information. Our industry is prepared to conduct surveys of our customers to assess consumer preference. I am assured that the International Fabricare Institute (IFI) will provide a sample survey if given adequate time.



Thank you for allowing our industry the time and opportunity to comment on the Care Labeling Rule revision.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Powell, Jr.", written in a cursive style.

Raleigh F. Powell, Jr.

Acting Executive Director – South Eastern Fabricare Assn.