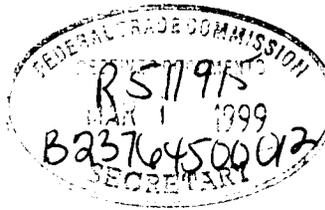


Secretary
Federal Trade Commission
6th & Pennsylvania Avenue NW
Washington, DC 20580



2/26/99

Re: 15 CFR Park 423 - Care Label Rule

I work for Celanese Acetate LLC. in Rock Hill, South Carolina. Celanese Acetate is the leading acetate producer in the world. Celanese employs approximately 4,000 people mainly in South Carolina, North Carolina and Virginia. Wages paid to Celanese employees along with supplies purchased from local vendors have a major economic impact in the Southeast. Celanese produces about 200,000,000 pounds of acetate filament yarns annually in two plants in the United States for textile applications.

Garment manufacturers use fabrics made from Celanese Acetate yarns in a variety of apparel end-uses. The major end-uses are apparel linings for women's and children's wear, men's and boys wear and fashion fabrics for women's and girls wear. Specifically manufacturer use acetate fashion fabrics in women's and girl's dresses, blouses, slacks and knitted tops.

Celanese Acetate supports alternative labeling for care labels for apparel. This labeling must include all appropriate methods of care for garment containing acetate yarns. We believe alternative labeling should include instructions for home laundering when appropriate.

The "Professional Dry Cleaning" method is the preferred cleaning method for garments made from 100% acetate fabrics and from acetate rich fabrics. Professional dry cleaning helps to restore the original appearance, minimizes shrinkage and has little or no effect on the color permanence of acetate garments. Professional dry cleaning includes finishing and touch-up steps to improve garment appearance by reducing creasing after cleaning.

Professional Wet Cleaning is still in the early development stages. At this time the industry has not defined wet cleaning equipment nor established fabric performance standards. Our laboratory studies indicate 100% acetate and acetate rich garments suffer excessive shrinkage, have poor color permanence and require additional finishing steps after cleaning by the Professional Wet Cleaning method. Professional dry cleaning is clearly the better cleaning choice for acetate garments.

Thank you for allowing public comment on this issue. We request that you keep the record open and please give consideration to actual consumer preferences.

Best regards,

Newton Williams / for William M. Reid

William M. Reid
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