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Dr. Manfred Wentz

March 1, 1999

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Mr. James G. Mills
Attorney, Division of Enforcement
Federal Trade Commission

Washington, DC 20580

RE: Proposed Rule on Care Labeling: Professionally Wet Clean Instructions

Dear Mr. Mills:

Although I was unable to attend FTC's public workshop on the care labeling rule on January 29, 1999, I understand that there is still an opportunity to comment on the proposed rulemaking.

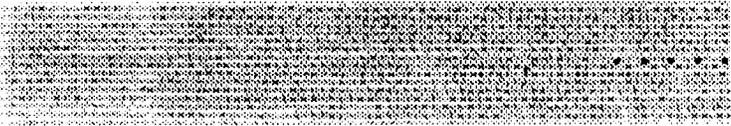
I am submitting my comments as Secretary and retired Chair of the Research Committee RA 43, Drycleaning Test Methods of the American Association of Textile Chemists and Colorists (AATCC). This committee develops national test methods for assessing the performance of textiles in drycleaning. I serve also as USA Delegate and Expert to ISO/TC38/SC - Textiles-Cleansing, finishing and water resistance tests, which develops international test methods for textile care. The textile and apparel industry uses these test methods for care labeling.

I will restrict my comments on professional wet cleaning and focus specifically on the two issues at hand: definition of wet cleaning and test methods.

1. Definition of Wet Cleaning:

The two definitions given for "professional wet cleaning" (Federal Register, December 16, 1998 p. 69234 and p. 69235) are detailed and reflect the agenda of narrowly focused interest groups. National and international committees, with members of diverse interest and representation, develop consensus definitions. The European Wet Cleaning Committee (EWCC), formed when wet cleaning developed in Europe, drafted the following working definition for wet cleaning:

"Wet cleaning is a process for cleaning sensitive textiles (wool, silk, rayon, natural and man-made fibres) in water by professionals using a special technology and detergents that lead to minimum fabric shrinkage and damage. It is followed by an appropriate tumble drying and restorative finishing procedure."



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A revised version thereof is likely to be submitted for consensus ballot when a reliable international test method for wet cleaning is developed.

2. Test Methods for Professional Wet Cleaning:

At the last ISO/TC38/SC2 meeting on July 30, 1998 in Charleston, SC, nine countries (China, Finland, France, Japan, Poland, Portugal, Switzerland, UK, and USA) passed several resolutions. They directed its secretariat to establish a formal liaison with the European Union AQUACARB project. This liaison is now in place.

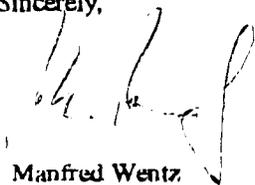
The objective of the European Union project AQUACARB is the development of consensus standards for testing textile articles in commercial wet cleaning and hydrocarbon solvent cleaning processes. If successful, the test methods or standards will support the care labeling codes or requirements internationally.

AATCC's RA 43 committee will participate in round-robin tests with the European consortium. We will use the same test garments, fabrics, representative machinery and processes to assess their performance in wet cleaning. If necessary, we will expand the study to reflect specific market conditions in the United States. The work will be streamlined with EPA's research project on alternative textile care technology at North Carolina State University (NCSU) and Texas Woman's University.

It is not possible to predict when a consensus standard for wet cleaning will be in place in the United States or elsewhere. However, the directions are set to generate reliable information for decision-makers in the textile and apparel industry. Without it, consumers and the textile care industry can not take full advantage of professional wet cleaning. They have, of course, the option to select professional wet cleaning as their choice of textile care at their own risk.

Therefore, I urge the Federal Trade Commission to delay the requirement for a professional wet cleaning label until consensus test methods are in place.

Sincerely,



Manfred Wentz
Visiting Professor
NCSU College of Textiles

cc.: Jack Daniels, AATCC
Chris Tebbs, UK, Manager, EU Aquacarb Project
Mike Palin, UK, Convener, ISO/TC/38/SC2/WG 1
Charles Riggs, TWU
Perry Grady, NCSU
Cindy Stroup, EPA

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