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

Established 1900

February 25, 1999

Re: 16 CFR Part 423 - Care Label Rule

Dear Sir/Madam:

I am the Vice-President of a large drycleaning, laundry and leather cleaning operation in western North Carolina. The company was founded by its present owner's grandfather in 1900. I personally have over 20 years experience in the industry and am a second generation drycleaner. This company operates seven retail outlets as well as two wholesale leather routes in three states. Annually, we process approximately 500,000 pounds of drycleaning and laundry and 11,400 leather garments. To accomplish this we have a staff of 50 well trained people.

I am writing today to voice my opinion on the proposed revision of the Care Labeling Rule. As a service provider to the general public we are keenly aware of the many problems that persist in the marketplace today. The time has come for the FTC to use this opportunity to change the Care Label Rule by requiring the manufacturers to provide the consumer with all appropriate care methods. By doing so the FTC will be able to fulfill its mission by:

- providing the consumer with full disclosure
- do so at a minimal cost
- put the U.S. on par with the European community
- allow for the the development of labeling for new fabric care methods such as wetcleaning and liquid CO2.

In response to some of the questions you have posed, I would like to give you a cleaners perspective on these issues.

- Q. Should the rule be ammended to require a washing instruction for all items that can safely be washed at home, even if drycleaning would be an appropriate alternative care method?
- A. As the Rule now stands, the consumer and cleaner legally have only the option of processing the garment as the label states (and only one method need be stated). However, we and the consumer need to know if the washable garment with a solvent soluble stain can be sucessfully drycleaned to remove that spot witout damaging the color or fabric. To further complicate matters, testing is often inconclusive. If garments contained labels with alternative care methods the consumer's problems of spot removal could be addressed much easier.

- 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. Many manufacturers have already addressed this issue by the use of the term "for best results dryclean", along with wash instructions. The beauty of this label is that it allows the consumer the option and informs the drycleaner that the garment can withstand moisture for water soluble spot removal. This points to the value of alternative care procedures from a consumer and professional point of view.
- Q. Can criteria be identified that would assist manufacturers in determining when a home-laundry instruction, although technically feasible, should not be used because it would result in a less than ideally refurbished garment?
- A. Again, the label "for best results dryclean" has served the consumer well. However, in this situation, a warning should be printed on the label. Aren't the manufacturers severely misleading the consumer without such information?
- Q. Should the Commission amend the Rule to permit, or to require, a "Professionally Wetclean" instruction?
- A. With the lack of a rule to define "Professional Wetcleaning", would this not be a license to steal for anyone with a five gallon bucket, as well as a huge point of contention as to the question of, was the item "properly" wetcleaned.
- Q. How should the Rule define "Professional Wetcleaning"?
- A. The term "wetcleaning" is relatively new to the industry, however its application is not. Wetcleaning can be accomplished in several different ways, be it hand cleaning in a sink or the use of a gentle cycle machine in conjunction with specially designed detergents and conditioners. Professional Wetcleaning can only be determined by a degree of knowledge with respect to fabrics, dyes and trim. These can all prove difficult to ascertain. I may add that the use of the term "Professional" may need some serious looking into with regard to this industry as well as others.
- Q. Should the requirement specify a type of professional wetcleaning equipment?
- A. This would be a mistake since a true professional can accomplish wonderful results in a sink, or one of the new "wetcleaning machines" available in today's market. One must also realize that technology is only now entering this ever-more popular method of fabric care and many transformations of today's equipment are inevitable. Therefore, specifying equipment types would certainly limit creativity in future development of new equipment.
- Q. Should the inclusion of other appropriate care methods be mandatory or optional?
- A. The inclusion of all appropriate care methods with necessary warnings should be required on all garments currently covered under the Care Label Rule. That will help the consumer make a conscious decision as to how they wish to care for their garment. It will give the professional cleaner a better understanding of his or her options when attempting difficult spotting procedures, thereby more completely satisfying the consumer. It also places some responsibility on the manufacturer to produce a serviceable garment.

It is my opinion that the garment industry is basically operating as they wish. Manufacturers are producing unserviceable garments with little or no concern of being held accountable for their lack of proper testing and novices are buying some drycleaning equipment and calling themselves "Professionals".

I would suggest to you that if garment manufacturers were required to test their products and label them accordingly, the consumer's needs would be much better served. I would also like to add that local drycleaners would probably be very willing to help with these tests. However, none of this will come about unless the garment manufacturing industry takes the time to test it's products. The drycleaning industry must become a skilled "profession", and governmental agencies and the public must hold the irresponsible parties accountable.

Thank you for allowing our industry to comment on this very important issue. We urgently request that the record be kept open and ask that you assist in conducting a customer survey so as to receive a true assessment of consumer preferences regarding garment care labels.

Respectfully,

A handwritten signature in black ink, appearing to read "Marvin M. Thomas, III". The signature is fluid and cursive, with a large initial "M" and a stylized "T".

Marvin M. Thomas, III
Vice-President, Swannanoa Cleaners
Vice-President, North Carolina Association of Launderers and Cleaners

NOTlogue

INTERNATIONAL FABRICARE INSTITUTE BULLETIN

There may be some difficulty processing the garments featured here. Members have indicated that the damage occurred even though these garments were cleaned according to the care label. The garments shown are among the top repeaters received in IFI's Textile Analysis Lab, and are selected on the basis of seasonality and timeliness of the problem.

IFI has contacted the manufacturers to work with them on resolving these problems. The reverse side of this bulletin details the status of this work. However, as these garments are currently on the market, and since we have seen repeated examples of damage, you may want to discuss these potential problems with your customers. □



Manufacturer: Verso

Description: Black and blue nylon coat with orange fleece lining.

Problem: When the item is dry-cleaned, as recommended on the care label, the zipper teeth partially or completely dissolve. Testing done on remaining zipper material shows that it softens in solvent.



Manufacturer: Scarlett

Description: Short jumpsuit/romper with matching jacket and belt. Fabric is made from a blend of rayon and acetate.

Problem: The dyes contain a solvent-soluble component. When the garments are drycleaned, as indicated on the care label, a color change from tan/brown to green occurs.



Manufacturer: Kloz Lyne

Description: Sheer, layered dress made from rayon. Bottom layer is green, and the top layer is a green, tan, and black snake-like print.

Problem: A component of dye in the print material is removed in drycleaning. This contributes to general lightening of the base color, and overall color change. The care label recommends drycleaning.



Manufacturer: The Limited

Description: 100 percent nylon, white down jacket with black trim.

Problem: When the item is drycleaned, oily residue from the down stains the shell fabric. This damage is more prominent at the seams. Also, the down feathers can be seen through the shell fabric. Many of the garments received also had complaints of shrinkage.

A New Wrinkle in High Fashion

Costly, Uncleanable Clothes

A \$3,000 metallic Versace gown comes with several commitments: You will explain to friends why you spent the equivalent of a family's life savings on a garment. You will bare more skin than you ever have publicly outside the junior high school locker room. And you will dry-clean.

But it seems that many expensive frocks were truly meant to be worn only once because they do not hold up to dry cleaning, according to a report released on Friday by the Neighborhood Cleaners Association.



Photo by Dan Lecca (Versace) in New York Times

In its report — based on the obsessive cleaning of thousands of garments — the association contends that dozens of manufacturers, ranging from the high-end house of Versace to unknown makers of chenille sweaters, produce clothes, that cannot stand up to the cleaning procedures that their labels recommend.

“There is a lot of thinking among manufacturers that style is what sells and let's worry about the serviceability later,” said Daniel Eisen, chief analyst for the association, who runs its testing lab. “I have encountered labels on \$4,000 sweaters where it says the garment is washable and it shrinks right up.”

Mr. Eisen tests garments at the association's headquarters in Manhattan, in an operation so respected in the garment industry that it has been used to clean Diana Ross's gowns and items from the Costume Institute of the Metropolitan Museum of Art.

The association, which has 4,000 members worldwide, exists principally to train drycleaners and to

smooth customer relations — often a touchy subject with cleaners that are used to customers accusing them, a la “Seinfeld,” of turning their favorite shirts into puppet clothing.

The lab regularly tests garments so manufacturers can find if they are indeed drycleaner safe. Often, a manufacturer will keep a garment off the market if it does not pass muster with the association.

But the organization also spends a lot of time looking over clothing that its members or customers bring in with the complaint that a dry cleaner destroyed it. The association is often consulted in arbitration over dry cleaning.

The association will then put the garment through rigorous tests, sometimes deciding that a cleaner was at fault, but more often finding that item was not designed to hold up to dry cleaning. Indeed, the association has found that in 43 percent of dry-cleaning disasters, the manufacturer is at fault; in 42 percent, the customer has mistreated the item, and in 15 percent, the cleaner has mishandled the garment.

The association reports its findings once a year as a warning to both its members and the dry-cleaning public. Often, cleaners will hang up notices in their stores warning customers what to expect should they bring, for instance, a certain striped Tommy Hilfiger shirt that the report calls a repeat offender in the dry cleaning hall of shame.

Others that made the report include Versace dresses and various makers of sweaters. One \$3,500 black Versace dress had plastic bra cups that stiffened with cleaning and made the dress unwearable, Mr. Eisen said. In addition, he cited the metallic Versace dress that saw its color rub off with cleaning.

“I called the stores,” Mr. Eisen said. “I don't know if they go to school to learn to say this, but they all tell me the same thing, that they have sold 5,000 dresses with no problems. In the meantime, I have three of the same dress with the same problem.”

The association once received a letter from Tommy Hilfiger's lawyer, but after they sent him the offending garments, the correspondence ended, he said.

A Tommy Hilfiger spokeswoman said in statement this week. “We have strict manufacturing guidelines, rigorous testing procedures and employ a staff of fabric care experts to insure that quality standards are met.” She added, “Unfortunately, the Neighborhood Cleaners Association has not shared their testing procedures with the company, nor have they shown the garment to us for independent testing evaluations.”

Notions that the association may be just the teeniest bit biased, given its membership, are challenged during a visit with Mr. Eisen in its lab on West 29th Street in Manhattan. Drycleaning machines whirred all around him. Bottles of testing solvent were lined up next to ironing boards.

Mr. Eisen was scrubbing and pressing with all the concentration of a nuclear physicist working away at an atom. Over at a rack of hanging samples, he pulls at a Barneys New York private-label rain jacket that became so stiff from cleaning that it literally stands up by itself on a table. “This was soft as butter when it was brought in,” he said.

A red linen suit appeared to have been attacked by squirrels. “The yarns were too weak,” he said, his voice tinged with disgust.

For its part, the house of Versace did not dispute that its clothes can sometimes be hard to clean, nor was it bitter that the association had cited it. “Versace's lines of haute couture and ready-to-wear contain garments of high fashion with complicated embroidery on delicate silk, beading, leathers, etc.,” a spokesman said in a statement. “The serviceability of these products is not easy.” But, he added, “The Versace company will continue to expand in-house research on fabric serviceability, considering the insights provided by the association.”

Mr. Eisen is not waiting for a group of Versace designers in spike heels to come teetering into his grim classroom of the drycleaning arts. But it is almost certain he would love it.