



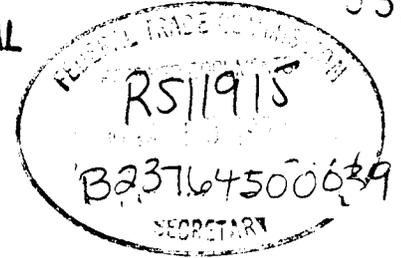
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ORIGINAL



Donald Clark, Secretary
Federal Trade Commission
Sixth and Pennsylvania Ave, NW
Washington D.C. 20580

February 23, 1999

Dear Mr. Clark

I'd like to take a moment to give comment on 16 CFR part 423-Care Labeling Rule. Ecology Action, Inc. has been working as a consultant to EPA Region 9 and the City of San Francisco over the past two and a half years in order to help dry cleaners reduce their reliance on perchloroethylene. I support FTC's move to require a "professional wet clean" label, however it is imperative that professional wet cleaning be defined accurately.

I would like to suggest that, at a minimum, the definition include the use of computer controlled washers and dryers which monitor agitation, temperature, and moisture content, and input of commercially available soaps and conditioning agents formulated specifically for processing fine garments in water. Including advanced finishing equipment in the definition is also recommended since it greatly increases the volume of garments that can be processed cost effectively.

Thank you very much for your time.

Regards,

Mahlon Aldridge
Director, Pollution Prevention Programs
Ecology Action, Inc.