



UNITED STATES
ASSOCIATION OF
IMPORTERS OF
TEXTILES AND
APPAREL

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Federal Trade Commission
Office of the Secretary
Room H-113 (Annex O)
600 Pennsylvania Avenue NW
Washington, DC 20580

**Fur Rules Review, Matter No. P074201
77 Federal Register 57043 (September 17, 2012)**

Dear Mr. Clark:

These comments are submitted by the United States Association of Importers of Textiles & Apparel (“USA-ITA”) in response to the Notice of Proposed Rulemaking, 77 Federal Register 57043, September 17, 2012 (the “Notice”) relating to proposed changes in the Fur Act Regulations, 16 C.F.R. Part 301.

USA-ITA is a voluntary association of some 200 importers, distributors, and retailers of textile products and wearing apparel, as well as related service providers such as international transportation providers.

USA-ITA’s principal concern with respect to the current fur rules relates to the very specific labeling requirements, *e.g.*, label and print size. The Commission proposes to replace these requirements with the general requirement that the information be clearly legible, conspicuous, and readily accessible to the consumer. USA-ITA supports this proposed change and urges that it be adopted.

The Commission proposes changes in §301.27 to require only that the label be of such durability that it remain attached to the product until delivered to the ultimate consumer. USA-ITA supports this proposed change and appreciates the Commission’s confirmation that a sewn-in label is not required. 77 Federal Register 57050, fn 122.

USA-ITA urges that the requirement for a separate origin declaration as to fur be eliminated. In the majority of cases, the fur will originate in the same country as the apparel, and under the Textile Products Act, all apparel must be marked as to origin. In this circumstance, it is simply redundant to require a separate statement of origin for the fur.

Accordingly, USA-ITA suggests that §301.27(a) be amended by adding a new subsection (3) to read as follows:

(3) Provided, however, that a separate statement of fur origin shall not be required when the fur product is labeled as to country of origin and the fur incorporated in the fur product originates in the same country.

USA-ITA also suggests that §301.27(e)(2) be amended to read:

When a separate statement of fur origin is required, the name of the country of origin of the fur shall be preceded by the term *fur origin*; [].

USA-ITA appreciates the opportunity to comment on this important matter and urges that its suggestions be adopted.

With best regards,


Julia K. Hughes
President
USA-ITA