Professional Wet Cleaners Associations, Inc.
1464 Cary Avenue San Mateo, CA 94401

November 16, 2012

Donald S. Clark
Secretary of the Commission
Federal Trade Commission
600 Pennsylvania Ave., NW Washington, DC 20580

Dear Commissioner Clark:

The Professional Wet Cleaners Association (PWA) is writing to express our strong support for the requirement of a new 'Professional Wet Clean' care label. Whenever a garment requires professional cleaning or where professional cleaning is recommended, it should be "Professional Wet Clean". We request a hearing or workshop to be held on this proposed rule and request more time to gather comments and collect evidence from Professional Cleaners in response to the FTC's questions on page 58349 of Federal Register Vol. 77, No. 183.

The Professional Wet Cleaners Association (PWA) is a non-profit organization formed in 2011 in California, and is made up of cleaners exclusively using professional wet cleaning technologies. Our members are approaching 100 and growing rapidly. Since the mid-1990s, Professional Wet Cleaning, an alternative process for cleaning and finishing delicate garments typically labeled 'Dry Clean' or 'Dry Clean Only,' has grown substantially around the world and in the United States. In California alone there are over 200 dedicated Professional Wet Cleaners who are successfully wet cleaning garments they had previously dry cleaned. In addition to these 100% dedicated Professional Wet Cleaning facilities, there are many dry cleaners in the United States who also have installed a Wet Cleaning machine in their stores! As Professional Wet Cleaning has grown, so has a vast infrastructure of equipment manufacturers, detergents, service technicians, and skilled trainers. PWA believes that the proposed rule, which ***allows*** but does not ***require*** the use of a 'Professional Wet Clean' label, is unfair and deceptive to the professional cleaners , manufacturers and especially to the consumers that wear garments labeled 'Dry Clean Only' or 'Dry Clean'. The fact is that these garments can also be successfully Wet Cleaned. The primary difference between dry cleaning and wet cleaning is that wet cleaning uses water and biodegradable detergents as cleaning agents. Now, consumers have an option for how their delicate garments can be cleaned and the care label should inform customers of these options. Without a requirement to disclose the alternative care, the label is deceptive to consumers.

The FTC requests evidence for why allowing, but not requiring, the "Professional Wet Clean" label is deceptive and unfair. PWA members converted to Professional Wet Cleaning from Perc Dry Cleaning and are now successfully Wet Cleaning the full range of garments they had previously Dry Cleaned. This includes traditional business apparel as well as couture garments such as Chanel, Versace, Dolce and Gabanna, Gucci, Vera Wang, Louis Vuitton, just to name a few. As with Dry Cleaning, there is an occasional garment that is ruined in the process of cleaning, but the percentage of garments ruined is very small and similar to what it was when our cleaners were dry cleaning garments. Overall, the

evidence, based on the years of experience of our members, is that well over 99.9% of our customer's garments currently labeled "Dry Clean" or "Dry Clean Only" have been successfully Wet Cleaned and could carry a "Professional Wet Clean" label. It is clearly deceptive and unfair for the label to not reflect this when in fact the practice is being carried on thousands of garments daily in hundreds of cleaners throughout the U.S.

While we are able to successfully Wet Clean every garment customers bring in labeled "Dry Clean" or "Dry Clean Only", in our daily interaction, customers come into our facilities and ask for their garments to be dry cleaned because the garments are labeled "Dry Clean"' or "Dry Clean Only". Our customers believe that dry cleaning is the ***only*** method for cleaning these garments because the label tells them so. This evidence that we experience on a personal level shows that the "Dry Clean" or "Dry Clean Only" is clearly deceptive to customers. If we tell our customers we will be Wet Cleaning their garments they may decide to go to a Dry Cleaner and we lose business. If we say "Yes, we will Dry Clean the garment", we continue the deception to our customers. This is definitely unfair to Professional Wet Cleaners since Dry Cleaners are not put it the same dilemma. This deception creates an uneven playing field in marketing our services. We cannot market our services as "Professional Wet Cleaning" because the care label says Dry Cleaning. Dry Cleaners market their services as "Dry Cleaning" because the care label says so. In addition, this dilemma of either lying to the customer or potentially losing existing or new customers makes Professional Wet Cleaning unappealing to many Dry Cleaners who desire to convert to Wet Cleaning. This is especially true because most owners of Dry Cleaners are first generation immigrants who do not want to take business risks.

The lack of a "Professional Wet Clean" care instruction is also unfair to Professional Wet Cleaners because a "Dry Clean" label does not provide us with information helpful in processing the garment. The "Professional Wet Clean" care label system developed by the International Standardization Organization (ISO) provides three variations of the Wet Clean Label which would help inform the Wet Cleaner on best practices for processing the garment. Requiring a Wet Cleaning instruction would benefit cleaners and consumers in that there would be a substantial lesser risk for ruining a garment, if proper instructions were required.

The FTC asks for evidence about the benefits and costs if they require the use of a "Professional Wet Clean" instruction. In terms of costs, the years of professional experience of our members and the industry expertise we have developed should constitute a reasonable basis and standard of care that manufacturers can use when determining whether a garment can carry a Professional Wet Clean instruction as well as the particular instruction. The past experience and industry expertise is a low-cost means of determining reasonable basis for care labels that does not overburden manufacturers or consumers. In terms of benefits, requiring the "Professional Wet Clean" label would inform all customers using Professional Cleaning services about Professional Wet Cleaning as an option as well as inform all cleaners who are Professional Wet Cleaners about the proper method for caring for the garments. The evidence from our members is that there are several environmental benefits as well. Professional Wet Cleaning uses less energy than Dry Cleaning and there is no costly hazardous waste generated or waste disposal fees. Perc Dry Cleaning on the other hand can lead to water and soil contamination to name just a few problems.

The FTC also suggests that if they simply allow the use of the "Professional Wet Clean" label that customer demand for Wet Cleaning would provide an incentive for garment manufacturers to use the "Professional Wet Clean" label. Yet the FTC does not provide any evidence that customers would choose to purchase garments based on a "Professional Wet Clean" label, nor did the FTC provide any evidence that garment manufacturers would begin labeling garments with a "Professional Wet Clean" label. Our understanding from our equipment manufacturers based in Europe is that while the ISO Professional Wet Cleaning label was adopted in 2007, garments sold in Europe that can be successfully Wet Cleaned have continued to be labeled "Dry Clean". This evidence suggests that a market approach will not work and that they only way to guard against deception and to assure an even playing field is to ***REQUIRE*** the use of the "Professional Wet Clean" label.

Many consumers avoid purchasing delicate garments labeled "Dry Clean" or "Dry Clean Only" in order to avoid health hazards associated with Dry Cleaning solvents. Customers have stated that Dry-Cleaning chemicals cause allergic reactions to their skin and body. This includes skin redness, rashes, and sometimes headaches. Many consumers also state that they cannot tolerate the odor from clothing that has been Dry Cleaned. A "Professional Wet Clean" care label would enable consumers to freely purchase and wear a wider range of clothing since Wet Cleaning would enable a safer and healthier alternative cleaning method. The motto of a prominent environmentally conscience company, **7th Generation**, has adopted this motto regarding social responsibility: ***"In our every deliberation, we must consider the impact of our decisions on the next seven generations."*** - **From the Great Law of the Iroquois Confederacy.**

We all have a social responsibility to protect and inform the consumer population about what is true and correct. In addition, this great nation which has been a forerunner of innovation and success should lead the way for other nations to follow its exemplary decisions in ensuring the public well-being of its citizens as well as preserving Mother Nature and the environment that we as humans have been entrusted with. If you have any questions, please feel free to contact me directly at (707)-486-8934. We look forward to working with the FTC on this important public policy issue.

Sincerely,

Gus Chang

President

Professional Wet Cleaners Associations, Inc.

LIST OF PWA MEMBERS –

VENTURA MARINA VILLAGE CLEANERS 2415 Harbor Boulevard Ventura, CA 93001-3904 Sun Choi (805) 642-0445

PLAZA CLEANERS 1730 E Ave De Los Arboles # F Thousand Oaks, CA 91362 Peter Jung 805) 493-2715

LOS ANGELES POINT DUME CLEANERS 29211 Heathercliff Road Malibu, California 90265 Michael Sunwo (310) 457-3606

LOS ANGELES COLONY CLEANERS 3872 Cross Creek Road Malibu, CA 90265 Mina Mallari (310) 456-6202

SUN HILL CLEANERS 8846 Foothill Boulevard CA 91040-1925 Janet Kwon (818) 353-1808

BUCKBOARD CLEANERS 1465 East Valley Boulevard Alhambra, CA 91801-5239 Nam (626) 284-5450

JC's CLEANERS 1331 East Carson Street Carson, CA 90745-1631 Brian Yu (310) 518-1064

FAY CLEANERS 1168 East Artesia Boulevard Long Beach, CA 90805-1555 Lisa Tsan (562) 422-3061

OK CLEANERS 2625 North Garey Avenue Pomona, CA 91767 Lawrence Lee (909) 392-3927

NORTON'S CLEANERS 204 East Yorba Linda Boulevard Placentia, CA 92870-3417 Jack Norton (714) 524-7130

ONE DAY CLEANERS 26012 Marguerite Pkwy # I Mission Viejo, CA 92692-3263 Sang Im (949) 582-5305

CLEAN 4-LESS CLEANERS 4028 Grand Ave # D Chino, CA 91710-5486 Davis Lee (909) 591-6378

GOLDEN HANGER CLEANERS 883 West Foothill Boulevard Upland, CA 91786-3727 Chong Kim (909) 982-1915

NATURE'S BEST CLEANERS 8782 19th St. Rancho Cucamonga, CA 91701 Sung Park (909)989-4777

RIVERSIDE PALM CLEANERS 10247 Magnolia Avenue Riverside, CA 92503-3440 Kyong Ha (951) 688-0450

NATURE'S BEST CLEANERS 364 S. Indian Canyon Dr. Palm Springs, CA 92262 Jung Choi (760)320-8414

SAN DIEGO SUNNY FRESH CLEANERS 8849 Villa La Jolla Dr # 305 San Diego, CA 92037-1958 Hwa Lee (858) 455-0071

PLAZA CLEANERS 2610 Broadway Street Boulder, CO 80304-3542 Seo Oh (303) 442-9247

NEWCASTLE CLEANERS 6920 Coal Creek Parkway SE Ste. 5. Newcastle, WA 98059 Glen Kim

MENDOCINO MASTER CLEANERS 502 South State Street Ukiah, CA 95482-4911 Sung Kim 707-462-4129

SONOMA NATURES BEST CLEANERS 915 Lakeville St. Petaluma, CA 94952 Gus Chang 707-486-8934 TIP

TIP TOP CLEANERS 33 Henry Street Cotati, CA 94931-4232 Chong Lee 707-578-1626

LAKESIDE CLEANERS 4211 Montgomery Drive Santa Rosa, CA 95405-5306 Ho Choe 707-539-6525

MARIN PACIFIC HEIGHTS CLEANERS 2631 Bridgeway Sausalito, CA 94965-3402 KARL HUIE 415-331-3015

CLEAN LOOK CLEANERS 743 East Blithedale Avenue Mill Valley, CA 94941 YONG SIM 415-381-3447

FAIRFAX FRENCH CLEANERS 173 San Marin Drive Novato, CA 94945-1209 YONG CHONG 415-898-2040

SACRAMENTO COUNTRY CLUB CLEANERS 2612 Watt Avenue Sacramento, CA 95821 PAUL LEE 916-482-6166

FOLSOM CLEANERS 316 East Bidwell Street Folsom, CA 95630-3115 CHONG JIN LEE 916-983-2378

CONTRA COSTA BOB's CLEANERS 777 23rd Street Richmond, CA 94804-1465 SERGIO RIOS 510-236-3471

SAN FRANCISCO VERMONT CLEANERS 600 Vermont Street San Francisco, CA 94107-2636 BENSON XU 415-647-8080

BUDGET CLEANERS 536 Divisadero Street San Francisco, CA 94117 YAK LEE 415-552-3736 ALAMEDA

HESPERIAN CLEANERS 15848 Hesperian Boulevard San Lorenzo, CA 94580 SUNG LEE 510-481-5825 MV

HOLYDAY CLEANERS 40093 Mission Boulevard Fremont, CA 94539-3680 DALMO LEE 510-656-8818

SAN JOAQUIN A-1 CLEANERS 136 West Walnut Street Stockton, CA 95204-5730 MARSHA TAKEDA 209-463-4952

SAN MATEO PRESS ON CLEANERS 1464 Cary Avenue San Mateo, CA 94401 JULI ROH 650-342-2987

ABC CLEANERS 445 Old County Rd San Carlos, CA 94070 PHILIP CHEN 650-592-6328 SANTA CLARA

NATURES BEST CLEANERS 1281 West El Camino Real Sunnyvale, CA 94087 PETER XU 650-969-0469

BL CLEANERS 171 Branham Ln # 4 San Jose, CA 95136-2339 JEAN CHA 408-224-4380 SAN FRANCISCO

Pacific Heights Cleaners 2437 Fillmore Street San Francisco, CA 94115 KARL HUIE 415 567 5999

OREGON Vanity Cleaners 1954 NE Highway 101 Lincoln City, OR 97367 Tae-Hwan Kim 541-829-1138

GLENDALE The Cleaning Store 1225 N. Pacific Ave. Glendale. CA 91202 KUN SONG (213)235-7277

Norvell Bass Cleaners 3323 State St. Santa Barbara, CA 93105 Sergio Castro (805) 687-8113

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