



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

11/15/2012

Reaction to request for comment re FTC care label

Dear Commissioner Clark,

Please consider this reaction to the request for comment re FTC care label for Professional Wet Cleaning.

As a company that launched Professional Wet Cleaning in Germany in 1991, we are very strong advocates of creating a level playing field for all professional cleaners and their vendors. Together with those professional wet cleaners, we have now proven beyond any possible doubt that Professional Wet Cleaning is a cleaning method that is used successfully to process -- economically and environmentally safely-- garments, which are labeled "Dry Clean Only."

The federal EPA shares the opinion that Professional Wet Cleaning is not only a viable alternative to dry cleaning with solvents, but it is also the most environmentally friendly of all technologies used in garment care. As a result, a number of states and cities have initiated grant programs to encourage cleaners to use Professional Wet Cleaning to replace; or to add to the solvent based technology they are using now to clean "Dry Clean Only" garments. Most recently the State of New Jersey successfully ran a grant program specifically aimed at encouraging Dry Cleaners to incorporate this technology in their plants.

For an ever-increasing number of cleaners, Professional Wet Cleaning is also the only viable cleaning technology that is left open to them after landlords have made the absence of any solvent dry-cleaning machines a requirement for a renewal of the cleaners' leases.

There is absolutely no reason why professional cleaners that use the Professional Wet Cleaning method exclusively in their operations should find themselves at a competitive disadvantage simply because their cleaning method is NOT LISTED on the care label in garments made in or for the USA. Likewise, vendors of Professional Wet Cleaning equipment are placed at a competitive disadvantage by the care labeling as it prevents



a large number of cleaners from embracing Professional Wet Cleaning as a technology of choice for their operations.

Currently, there are hundreds of dedicated wet cleaners operating in the USA who solely use water and soap to clean any and all garments that are presented to them by their customers. In California alone, there are 80 Miele Professional Wet Cleaners. We estimate that on average they process 200 "Dry Clean Only" garments per day. These cleaners work 5 days a week, 50 weeks a year essentially processing 4 million articles of clothing a year in their plants. I think they alone have already proven that Professional Wet Cleaning deserves to be treated fairly and find a place on the garment care label.

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