



November 16, 2012

Robert M. Frisby
Bureau of Consumer Protection
Project No. R511915

Dear Mr. Frisby:

We are writing to you today on behalf of the members of The Hosiery Association (THA), who represent over 90% of the legwear products sold in the United States and employ over 15,000 workers in 15 states to share our comments to the above referenced project.

Having reviewed the Federal Trade Commission's (FTC) proposed changes to the Care Labeling Rule, we would like to recommend that the exemption (Section (c) (2)) covering regular hosiery items remain in effect and extended to cover all hosiery products up to 100 Denier. Additionally, hosiery styles that are completely washable should be exempt regardless of retail price. The exemption should be based on the product's material content, not on its cost.

Given the fact that most hosiery items are completely washable, no special care or cleaning is required to maintain the integrity of the garment. Moreover, since the wear-life cycle of hosiery under normal wear is relatively short compared to other wearing apparel – such as jeans - we do not believe that a permanent, sewn-in garment label is necessary for these particular types of products. Further, hosiery garments are fragile and should be exempted on the basis that permanent sewn-in labels may harm the garment's appearance and usefulness by potentially causing holes or runs as well as providing discomfort to the wearer.

Our members believe that consumers are well informed by the inclusion of simple care instructions appearing conspicuously on the outside of the product package in a place that can be easily seen and considered prior to purchase.

The use of care symbols should be supplemented with written instructions. Some members believe that most consumers do not understand the meaning of either ASTM or ISO symbols without doing research. Additionally, until such time as the ASTM and ISO symbols are harmonized, ASTM symbols better serve the needs of the American market and products.

We offer no comments pertaining to the use of wet vs. dry cleaning since it is not recommended to clean our products using either method.

Thank you in advance for reviewing our comments and do not hesitate to contact me with any questions you might have.

Regards,

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Sally Kay
President & CEO

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