



INTERNATIONAL
Standards Worldwide

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November 16, 2012

Federal Trade Commission
Office of the Secretary
Room H-113 (Annex B)
600 Pennsylvania, N.W.
Washington, DC 20580

Re: Care Labeling Rule, 16 CFR Part 423, Project No. R511915

Dear Sir/Madam:

Attached please find comments on Care Labeling Rule, 16 CFR Part 423, Project No. R511915 from ASTM International Committee D13 on Textiles. These comments were approved by the members of Subcommittee D13.62 on Care Labeling, and as well as the D13.90 Executive Subcommittee.

ASTM Committee D13 on Textiles was formed in 1914. D13 meets twice a year, in January and June, with approximately 200 members attending three days of technical meetings. The Committee has 561 members and currently has jurisdiction of 364 standards. These standards address characteristics, properties, nomenclature, and uses of textiles.

ASTM appreciates the opportunity to provide these comments. If you have any questions, please contact the ASTM D13 Staff Manager, Jennifer Rodgers at: jroddgers@astm.org , 610-832-9694.

Sincerely,

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James A. Thomas

Cc: Jennifer Rodgers
Ellen Roaldi

November 16, 2012

Federal Trade Commission
Office of the Secretary
Room H-113 (Annex B)
600 Pennsylvania, N.W.
Washington, DC 20580

Re: Care Labeling Rule, 16 CFR Part 423, Project No. R511915

Dear Sir/Madam:

In response to the Federal Trade Commission's Notice of Proposed Rulemaking on the Care Labeling Rule, 16 CFR Part 423, Project No. R511915, ASTM International is pleased to submit the following comments.

ASTM Standard D5489-07 and Future Revisions to the Standard

ASTM International expresses support and appreciation for the Commission's amendment that includes updating the rule to reference the current version of D5489 (D5489-07) and allow the use of certain care symbols in lieu of written terms by permitting manufacturers and importers to use the symbol system set forth in D5489-07.

ASTM urges the Federal Trade Commission to remain informed in the future about updated versions of the ASTM standard to ensure the most relevant standard is referenced that helps to meet regulatory and market needs. ASTM committees, comprised of stakeholders from the private and public sectors, are required to review each standard at least once every five years with revisions possible any time the technical committees see a need to reflect new information, materials, or technologies.

Standards Tracker, ASTM's free online notification service, is available to any interested ASTM member or nonmember, and is an effective mechanism for the FTC to learn about newly approved standards, actions on existing standards, and work items. Standards Tracker is an automatically generated email notification of all ASTM standards actions, or it can be limited by a subject area interest like the care labeling symbols.

Value of International Standards for Users

ASTM encourages the FTC's use of international standards like ASTM D5489-07 that comply with the WTO principles of standards development. As a signatory to the WTO TBT Agreement, the U.S. Government is pledged to use international standards as the basis for technical regulations whenever possible. The utilization of international standards like ASTM D5489-07 eliminates barriers to trade because they are rooted in the principles of consensus, openness, and assistance to others. Also, the symbols contained in ASTM D5489-07 do not require any licensing fees for use.

Need for the Development of Foreign Language Tools

The record did not establish a need to amend the Rule to address care labels in multiple languages, however, should the need be identified, ASTM International standards are available in several other languages, including Russian, Spanish, Chinese, French, French Canadian and German. Through the development of a uniform system of symbols in ASTM D5489-07 and its availability in multiple

languages, retailers are better able to expand their markets. ASTM encourages the FTC to work with ASTM to continue to meet the needs of US businesses in international markets through the development of a foreign language tools, such as a multiple country language guide.

Conclusion

ASTM International is pleased for the opportunity to provide comments about the utilization of ASTM D5489-07 as the FTC continues its important review of the Care Labeling Rule.

ASTM International would welcome the opportunity to provide the FTC with up-to-date information about our standards and collaborate with the FTC to develop a multiple country language guide. We would thus appreciate your help identifying an appropriate FTC contact person to provide guidance on an ongoing basis. Additionally, ASTM International encourages FTC representatives to participate directly in the technical committees that develop and maintain the ASTM standards used by the Commission.

Thank you for your consideration. If you have any questions, please do not hesitate to contact Jennifer Rodgers by e-mail, jrodgers@astm.org, or phone (610) 832-9694.

Sincerely,

Ellen Roaldi
D13.62 Care Labeling, Subcommittee Chair