

Professional Leather Cleaners Association

www.professionalleathercleaners.org

FTC Care Labeling Rule Committee
Chairperson Jeff Schwegmann



Re: Care Labeling of Textile Wearing Apparel and Certain Piece Goods as Amended 16 CFR Part 423 - Comment

The Professional Leather Cleaners Association (PLCA) is a group of individual businesses providing wholesale specialty cleaning services, throughout North America. The members provide cleaning services for suede, leather, fur, and other specialty items. Together, the members serve over 5,000 dry cleaners. The PLCA assists dry cleaners in expanding their service capabilities to their customers, by providing the highest quality, most advance cleaning options in North America. Dry cleaners throughout North America outsource their specialty cleaning needs to members of our group. The PLCA members have specialized cleaning machines, processes and chemicals that allow them to provide expert suede, leather and fur cleaning services. All members have been thoroughly vetted for their quality of service and business practices.

As members of the Fabricare industry, we are commenting on the FTC's propose amendments to 16 CFR Part 423 and how they will affect our ability to operate a business and serve our customers. The PLCA has discussed the proposals brought forth by the FTC and our summary follows.

As specialists for the dry cleaning industry, we see the widest variety of care labels. Our customer's send us specialty garments with care label instructions that they can not preform or do not have the knowledge to perform in their own facilities. It is vital to the dry cleaner that the care label be a reliable form of instruction that has a basis placed on testing. Care labels that read dry clean only, but do not take into account the whole garment can lead to mistakes by the dry cleaner. The PLCA recommends that the whole garment be taken into consideration for care label instructions. The PLCA recommends that any item containing suede, leather or fur be label as clean by leather professional only. Solvent and machine companies have been misleading their customers to believe that by changing to their company's solvent or machine can allow them to clean their own suede, leather and furs. This has resulted in numerous mistakes by the average dry cleaner. Leather cleaning requires cleaning, refinishing and pressing. All specialized techniques to produce a high quality finished garment. The PLCA requests that *16 CFR Part 423 Appendix A, 8. Leather and Suede Cleaning: a. "Leather Clean" - have cleaned on,y by a professional cleaner who uses special leather or suede care methods*", is left intact and a recommendation made to garment manufactures that any item with leather materials be labeled according to this rule. The PLCA recognizes that many different types of solvents can be used to clean leather, BUT cleaning is not the whole process and does not sufficiently produce a high quality finished good. Only companies with the ability to clean, refinish with leather finishing products, and press; are able to Leather Clean to the acceptable standards. Testing of the whole garment including trims will allow for the correct definition of the care label rules to be used by the garment manufacture and followed by the dry cleaner. Any leather, suede or fur garment labeled by the manufacture as Leather Clean Only, that has *not* be cleaned by a professional

leather cleaner should be considered mishandled and the liability of the cleaner not following the proper care label instructions. The manufacture should be free of fault of any piece properly labeled according to the leather clean only rule. So;vent and machine companies should be held liable for providing misleading information to their customer's for telling them they can leather goods in their machines without informing them of required finishing techniques involved in performing the care label instructions of leather clean only.

The PLCA is interested in protecting the consumer from poor experiences by dry cleaners that do not properly clean their leather goods. The PLCA provides information and resources to the consumer to the give them a choice of how to care for the leather goods. Customers who seek out professional services to clean their items should be able to rely on the dry cleaner to follow the care instructions. The dry cleaner must rely on these instructions and believe that the manufacture has properly written and tested these garments for the cleaning techniques written on the care label.

The Professional Leather Cleaners Association appreciates the opportunity to comment on the Care Label Rule. Thank you for accepting our comments.

Please visit our website <http://www.professionalleathercleaners.org> for links directly to our members websites or you can contact our acting chairperson at 1-800-232-0792 or email at jeff@professionalleathercleaners.org.

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Professional Leather Cleaners Association members:

Arrow Leathercare - Bruce Gershon, Kansas City, MO
The Cleanery – Jerry and Scott Pardo, Farmingdale, NY
Don's Leather Cleaning, Inc. - Dart Poach, Minneapolis, MN
Hudson Services – Gerald Palmer, Providence, RI
LeatherCare, Inc. - Steve Ritt, Seattle, Washington
Radiant Leather Care - Steve Jennings, West Palm Beach, FL
Ram Leather Care – Mike and Linda Munson, Detroit, MI
Ram Leather Care - Pat Moffat, St. Louis, MO
SuedeMaster, Inc. - Brad Maxwell, Toronto, ONT Canada
Suedart - Luc Martin, Saint-Jean-Sur-Richelieu, QC Canada
Sunshine Suede and Leather Co. - Jeffrey R. Schwegmann II, Silver Grove, KY