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The National Cleaners Association (NCA) is pleased to submit these additional comments concerning the Care Labeling Rule.

The necessity for a rule requiring care instructions has our support and the thoughts and comments we jointly submitted under the ANPR with the Dry cleaning & Laundry Institute in August 2011 remains representative of our position. However, we have several additional thoughts, comments and clarifications we want to make at this time:

1. Re: dry cleaning definition. As stated in our original comments, the use of the term organic should be eliminated from the definition because several of the new solvents and others in development are not 'organic'. The broader definition of dry cleaning as 'a commercial process...in any solvent excluding water' suffices.

Also, in citing examples of various solvents, it should be made clear that these solvents are examples, and not an exhaustive list of the process technologies that the term dry cleaning represents. This is especially important given the growing list of alternative solvents available to consumers at their area dry cleaners.

2. The use of the care instruction PROFESSIONAL WETCLEANING should be permitted. The word professional will serve to mitigate any confusion in the consumers' mind between a professional wetcleaning process and home laundry.
3. The phrase 'exclusive of trim and ornamentation' and similar ambiguous language on a care label is unclear and meaningless to most consumers. The purchaser has no idea that the phrase means the trim used has to be removed prior to cleaning/laundrying and reattached after cleaning or washing. In addition, based on the method manufacturers use to affix said trim, the removal/reattach process might not even be possible.

The rule should require that any caveat like this should be stated in plain simple language: **Remove trim and ornaments prior to cleaning.** This type of clarity would enable the consumer to more easily identify an instruction that is either impossible to follow or would prove too costly for the garment to provide ordinary use.

In addition, if the manufacturer is permanently affixing an inventory control tag

that releases dye during dry cleaning and or laundering, the instruction to remove that tag should be part of the care label instruction.

4. Reasonable basis and reliable evidence: These terms of art need to be clarified and /or strengthened to ensure that the care label instruction has been based on sufficient evidence to satisfy the Commission's intent.  
Also the Care instruction must be consistent with the operating parameters of the dry cleaning systems that American dry cleaners are required to follow based on environmental, health, safety, etc. regulations and guidelines. Example: Perc dry cleaning instructions that require air-drying are recommending a prohibited practice that is not available to American consumers.

Thank you for your time and attention, and we remain available for discussion or clarification.

Submitted by:  
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