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**Via Internet**

**<https://ftcpublic.commentworks.com/ftc/carelabelinganpr>**

September 2, 2011

Federal Trade Commission  
Office of the Secretary  
Room H-113 (Annex A)  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

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

Dear Sir or Madam:

In response to the Federal Register notice, dated July 7, 2011, inviting public comments on the existing standards for Care Labeling, 16 CFR Part 423 (the "Standards"), The Children's Place Retail Stores, Inc. hereby respectfully submits the following comments.

The Children's Place Retail Stores, Inc. ("The Children's Place" or the "Company") is a leading specialty retailer of high quality, value-priced apparel, footwear, and accessories for children, newborn to age twelve. The Company designs, contracts to manufacture and sells its products primarily under the proprietary "The Children's Place" brand name. As of August 2011, the Company operated over 1,060 stores in the US and Canada, as well as an e-commerce site at [www.childrensplace.com](http://www.childrensplace.com). Consequently, it is of utmost importance to the Company that the Standards are updated to recognize the needs of a global marketplace.

Section 423.8(g) allows for the use of the symbol system developed and designated by the American Society for Testing and Materials (ASTM) as *ASTM Standard D5489-96c* in lieu of the care instruction terms specifically required by the Standards. The Standards specific reference to *ASTM Standard D5489-96c* is problematic for several reasons.

First, the Standards reference to *ASTM D5489-96c* does not take into account subsequent revisions and updates to the *ASTM Standards*. Accordingly, the current Standards do not allow the use of the symbol system *ASTM D5489-07*, an updated version of *ASTM D5489-96c*. The Standards should be revised to allow the use of the ASTM symbol system and any updates or revisions thereof.

Second, the Standards specific reference to the ASTM system does not allow the use of other care label symbols and systems developed and recognized in the global marketplace (ie. the European and International Standards Organization symbol system designated as *ISO 3758:2005*, Australian Standard *AS 1957-1987*, the Canadian standard for care labeling, or the Chinese Care Label standard designated as *GB/T8685-2008*, among others). As a result, textile wearing apparel sold in various markets around

the world would either require care labels that are extremely lengthy and wordy to accommodate the multiple language and symbol requirements of various jurisdictions, or multiple care labels in each language or symbol system required by each jurisdiction. It is our understanding that the US and the EU have been discussing the potential harmonization of care label symbol systems for several years. While these negotiations are pending, a suggested revision to the current Standards should allow for the recognition of or a reciprocity agreement among the various countries, including the US, whereby international and national care label symbol systems currently in use in the global marketplace are accepted and recognized by the signatory governments. A comparison of the international and national care label symbols currently in use in the global marketplace shows that, although not completely identical, the symbols are similar enough that international consumers would recognize and understand the instructions depicted by the respective symbols. By allowing the use of an internationally recognized symbol system, such as the ISO Standard for example, the FTC would help alleviate the additional economic burden placed on companies, such as The Children's Place, which have to produce costly multiple labels for products offered for sale in the global marketplace. This suggested update to the Standards would not be in conflict with the goals of the Standard, which is to provide consumers with reliable instructions for washing, bleaching, drying and ironing their clothing. To the contrary, allowing the use of symbol systems may in fact provide for simpler, less cluttered labels that are more easily understood by the consumer.

Thank you for your consideration of the views of The Children's Place. Should you have any questions, please contact me at (201)558-2400.

Very truly yours,

Mark Roše  
Senior Vice President – Chief Supply Chain Officer