



UNITED STATES FASHION INDUSTRY ASSOCIATION

Formerly United States Association of Importers of Textiles & Apparel (USA-ITA)

December 3, 2013

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

Wool Rules, 16 CFR Part 300, Project No. P124201
78 Federal Register 57808 (September 20, 2013)

Dear Mr. Clark:

The United States Fashion Industry Association (“USFIA”) submits the following comments in response to the Commission’s Notice of Proposed Rulemaking (the “Notice”) relating to rules and regulations issued under the Wool Products Labeling Act, 15 U.S.C. § 68-68(j) (the “Act”).

The United States Fashion Industry Association (USFIA) represents the fashion industry: textile and apparel brands, retailers, importers, and wholesalers based in the United States and doing business globally. Founded in 1989 as the United States Association of Importers of Textiles & Apparel with the goal of eliminating the global apparel quota system, USFIA now works to eliminate the tariff and non-tariff barriers that impede the industry’s ability to trade freely and create economic opportunities in the United States and abroad.

The regulations are found at 16 CFR Part 300. The Commission proposes to make a number of changes. USFIA's comments are confined to the specific provisions of particular concern to its members.

The Commission proposes to amend 16 CFR §§ 308.8(d) and 300.24 to recognize that a hang-tag that refers to a generic name, a fiber trademark, a coined word or a depiction that implies the presence of any fiber need not provide a complete fiber content disclosure. As amended, Sections 300.8(d) and 300.24 would require that if the textile fiber product contains fiber in addition to the fiber described there, the hang-tag must disclose that it does not provide the product's complete fiber content.

While the proposed change is a significant improvement, it does not eliminate completely the problem that the change is designed to ameliorate, *i.e.*, where the hang-tag is provided by the fiber producer and is intended to describe the performance characteristics of the fiber. A fiber producer will not know whether the textile product will contain fiber in addition to the fiber whose performance characteristics are described on the hang-tag. For that reason all

performance hang-tags will have to include the disclosure. This could itself be misleading when the fiber described is the only fiber in the textile product.

USFIA believes that the better approach is to eliminate the disclosure requirement unless there is a demonstrable danger of deception. An example might be a circumstance where the textile product contains only a small amount of the fiber described in the hang-tag. Otherwise, disclosure should not be required.

The Commission also proposes an amendment by way of clarification in Section 300.25(d). USFIA agrees that the proposed change eliminates any potential conflict between the Commission's rules and the origin rules enforced by United States Customs and Border Protection. USFIA strongly urges that the proposed amendment be adopted.

USFIA appreciates the opportunity to comment on these important matters and urges that the final rule reflect its views.

Sincerely,


Julia K Hughes
President