



we wearSM our mission

March 26, 2012

Secretary Donald S. Clark
Federal Trade Commission
Room H-113 (Annex A)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Mr. Clark:

**RE: Advance notice of proposed rulemaking; request for public Comment:
Rules and Regulations Under the Wool Products Labeling Act of 1939 (16
CFR PART 300, No. P124201; January 30, 2012)**

On behalf of the American Apparel & Footwear Association (AAFA), we are submitting the following comments in response to the advance notice of proposed rulemaking and request for public comment in regards to the Federal Trade Commission's rules and regulations under the *Wool Products Labeling Act of 1939* as posted in the Federal Register January 30, 2012.

AAFA is the national trade association representing U.S. apparel, footwear and other sewn products companies and their suppliers, which compete in the global market. Our mission is to promote and enhance our members' competitiveness, productivity and profitability in the global market by minimizing regulatory, legal, commercial, political, and trade restraints. Our member companies manufacture all types of apparel and footwear and are located in virtually every state in the US. They source and distribute products worldwide.

The use of labels on textiles and apparel is beneficial to consumers, manufacturers, and business in general as it allows for the necessary flow of information along the supply chain. Properly identifying the content of an item may help in a consumer's decision to purchase the item. In addition, it allows manufacturers to clearly and honestly display the quality of the product they are selling. However, some of the regulations on labeling apparel sold in the United States make the process challenging and unnecessarily complicated. AAFA values the partnership we have had with the FTC in the past and have supported efforts to clarify regulations including the publication of *Threading Your Way Through the Labeling Requirements Under the Textile and Wool Acts*. We applaud the FTC for examining these regulations and appreciate the opportunity to voice the concerns of our members and of our industry.

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Our message today is only that we see a continuing need for the harmonization of U.S. and international labeling requirements for apparel. At the domestic level, having two separate federal laws regulating content labeling, the *Wool Products Labeling Act of 1939* and the *Textile Fiber Products Identification Act*, leads to confusion and redundancy for U.S. companies. Around the world, the lack of harmonization between U.S. and international labeling requirements forces products destined for multiple locations to contain a superfluous amount of information. At that point, the product is not only costly to manufacturers, but also confusing for consumers and uncomfortable to wear.

The harmonization of apparel labeling requirements around the globe is a long-term goal for AAFA and we encourage the FTC to work on modifications to the current U.S. regulations in order to make the process easier and more cost-efficient for all parties involved. The FTC is an agency that not only regulates trade but seeks to encourage it as well. We ask you to keep this in mind while considering all comments submitted on the subject matter at hand and in future rule-making.

Again, we thank the Commission for the opportunity to comment on this issue and hope a positive solution may soon be reached. If you have any questions regarding these comments, please feel free to contact myself or my staff at mdavignon@wewear.org. Please do not hesitate to let us know if we can be of any help in the coming process.

Sincerely,

~

Kevin M. Burke
President & CEO
American Apparel & Footwear Association