



UNITED STATES
ASSOCIATION OF
IMPORTERS OF
TEXTILES AND
APPAREL

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

**Care Labeling Rule, 16 CFR Part 423, Project No. R511916
77 Federal Register 58338 (September 20, 2012)**

Dear Mr. Clark:

These comments are submitted by the United States Association of Importers of Textiles & Apparel (“USA-ITA”) in response to the Notice of Proposed Rulemaking, 77 Federal Register 58338, September 20, 2012 (the “Notice”) relating to proposed changes in the Care Labeling Rule, 16 C.F.R. Part 423.


USA-ITA was established in January 1989 by nine companies with a vision to create a unified voice for textile and apparel importers across the country. USA-ITA provides education, information, and advocacy to executives active in textile and apparel sourcing, importing, compliance, and logistics. Headquartered in Washington, D.C., USA-ITA represents the needs of some 200 American retailers, brands and importers, as well as related service providers.

The proposed rules would allow the use of two care symbol systems, ASTM Standard D5489-07 or the ISO 3758:2005(E). Manufacturers and importers who use the ISO care symbols must disclose they are so doing.

USA-ITA strongly supports the proposed rule. The ability to use the ISO system, which is widely used, will materially assist U.S. retailers and brands in their efforts to reach international markets. It will also eliminate one of the differences between domestic and international requirements.

USA-ITA appreciates the opportunity to comment on this important matter.

With best regards,


Julia K. Hughes
President
USA-ITA