

The FTC's proposed amendments to 16 CFR Part 423 WILL affect my ability to maintain my business and satisfy my customers. Please consider my comments.

WE CAN'T RUN OUR BUSINESS WITHOUT ACCURATE CARE LABELS!

How we clean, how we press, everything depends on the care label. We rely on the manufacturer's knowledge of the cleanability of an item and its decorations to properly care for our customer's property.

We have several garments each year that are damaged or ruined even when we DO follow the care instructions. This is usually because the trims, decorations or fasteners don't survive the recommended cleaning method. Unstable dyes that bleed from one part of the garment to another is a huge cause of loss for us. The losses we would incur with reduced or absent care label requirements would be insurmountable!

Our profits could never cover all of the claims our customer's would file if we didn't have care labels to help us properly handle their items. This month we cleaned a dress labeled "Dry Clean Only." The narrow, black leather piping bled all over the dress when dry cleaned. The customer expects us to pay for the \$700 garment. How many dresses would they have to sell to recoup the cost of testing and proper labeling? We would have to clean almost 100 dresses to recoup the cost of their one mislabeled dress.

We could reduce our losses if we tested every garment before we cleaned it. This is not practical. As a small family owned dry cleaner, we can't make our service affordable to the customer if we have to test every garment to determine how it could be cleaned. This would increase our supply cost (cleaning agents) and our personnel cost (manhours and higher pay for specially trained employees.) There would be no more profit and no more small business. In these difficult economic times, especially in Michigan, we need every profitable business we can get.

As much as we depend on care labels, we do have problems with them. Manufacturers often use "Spot Clean Only" on bridals and formals. But they can often be safely wetcleaned, especially if they are polyester. We can explain the wetcleaning process to the customer, but we are asking them to take a leap of faith that their expensive garment of sentimental value will not be ruined by going "against the care label." If there is a safe way to clean a garment, it needs to be on the care label. Manufacturers need to stop using overprotective, blanket recommendations that are inaccurate or incomplete, like this Spot Clean Only example.

Complete, accurate care label would help with stain removal also. Our customers think we are magic and should be able to remove every stain from every garment. We do a good job with the many resources available to us, but incomplete care labels can limit our ability to use every resource to satisfy our customers. Some stains, such as pet bodily fluids, respond better to water based cleaners. An item with a Dry Clean Only label that could also be safely wetcleaned may never get the proper spot treatment if we stick to the care label. All safe cleaning methods need to be listed so we can use all our resources to satisfy our customers. A dry cleaner's satisfied customer can lead to a satisfied consumer who develops brand loyalty at the point of purchase. That is good news for manufacturers and retailers also.

Manufacturers can only gain from using accurate and complete care labels. A customer needs to know what care is required for a garment in order to decide if they have the knowledge and resources to take care of the item. Most people would not be

able to determine washability of most garments without care labels. I would be very angry with a manufacturer or retailer if my garment were ruined because I had to guess how to clean it and I would not purchase their items again. Ultimately the customer will be the big loser if care label requirements are relaxed or eliminated!

The symbols on care labels now are helpful. Any symbols that are legally acceptable on the care label should be standardized and the explanation of those symbols must be readily available to professional cleaners. Adding symbols for wetcleaning would be an improvement to the Rule. Wetcleaning is becoming a more desirable method of cleaning. The fibers used in garments and the techniques of wet cleaning make it a necessary option if we're going to satisfy our customers. Wetcleaning guidelines and restrictions should be noted on the care label. A standardized system of symbols would be a good start in proper labeling for wetcleaning.

In summary, the Care Label Rule is a benefit to manufacturers, retailers, dry cleaners and above all to the consumer. All of us would benefit from an amended Rule that would clarify label requirements and provide for accurate and complete labeling. Thank you for the opportunity to share my input. I can't stress enough how seriously this law affects my business. Please contact me if I can answer any other questions.

Sincerely,
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