



Re: Care Labeling of Textile Wearing Apparel and Certain Piece Goods as Amended 16 CFR Part 423 - Comment

The Professional Leather Cleaners Association (PLCA) is a group of individual businesses providing wholesale specialty cleaning services, throughout North America. The members provide cleaning services for suede, leather, fur, and other specialty items. Together, the members serve over 5,000 drycleaners. The PLCA assists drycleaners in expanding their service capabilities to their customers, by providing the highest quality, most advance cleaning options in North America. Drycleaners throughout North America outsource their specialty cleaning needs to members of our group. The PLCA members have specialized cleaning machines, processes and chemicals that allow them to provide expert suede, leather and fur cleaning services. All members have been thoroughly vetted for their quality of service and business practices.

As members of the Fabricare industry, we are commenting on the FTC's propose amendments to 16 CFR Part 423 and how they will affect our ability to operate a business and serve our customers. The PLCA has discussed the questions brought forth by the FTC and our summary follows.

Is there a continuing need for the Rule as currently promulgated? Benefits? Costs?

The PLCA believes that the Care Labeling of Textile Wearing Apparel Rule is necessary to aid in determining the best method of care for a customer's clothing. The benefits to the consumer will continue to outweigh any suggested costs savings for small business.

Manufacturers have knowledge of all components of a garment and the requirement of a "reasonable basis" for care instructions on the label ensures that the consumer and the drycleaner can have reliable directions on how to care for a garment. Only the manufacturer's knowledge of these components can determine cleanability. The manufacturer should be required to identify all components that make up the textile along with the percentages of the content in the assembled product. The PLCA believes that there should be no exclusion for trims or decorations that the manufacturer has attached to the garment. The care label guides drycleaners in selecting the correct method for cleaning a garment and reduces the chance for mistakes. Well labeled garments benefit the consumer, the manufacturer and the drycleaner in servicing a garment.

If a care label is not attached to a garment both the consumer and the drycleaner must rely on extensive knowledge of fibers and weaves. What types fabrics can be safely cleaned by home washing and what fabrics can be drycleaned. This extra time and knowledge puts an unreasonable burden on the person or business caring for the garment when there is no care label present.

What modification should be made to the rule to increase the benefit small business?

All methods of care should be written in a garment care label. A proper care label will help the consumer get the cleaning results they expect from home washing or drycleaning.

The PLCA believes that all leather goods should continued to be labeled with care instructions for the consumer and the drycleaner. Leather cleaning is a unique process not offered by many cleaners due to the extensive knowledge, training, specialized chemicals and equipment required to professionally clean leather garments.

The PLCA believes that a recommendation to clarify care labels would be a benefit to the consumer, the manufacture and the drycleaner. Currently, there are labels, on the leather goods, that state Dryclean Only. The PLCA believes that this label is misleading and may lead a conventional drycleaner to follow the instructions and produce a piece for the consumer that is unacceptable. If this happens, the consumer is upset by the quality. The drycleaner may face a claim to pay for garment or have to issue a refund, but the manufacture may not be held responsible because they are in compliance with the Carel Label Rule, despite a label that should have been more specific. A conventional drycleaner does not have the proper equipment, or products that are required to finish a leather garment, yet they followed the care label. A care label stating “Dryclean by Leather Specialists, “Dryclean Only by Professional leather cleaner,” or “Leather specialists Dryclean Only,” would have prevented the drycleaner from making mistakes in their choice on servicing the garment. The consumer would be more satisfied that their leather garment was handled properly and the manufacture would not be held liable for their care label.

The clarification in wording identifies to the consumer that they must seek out a leather professional for care of their goods and that they should question the drycleaner about this service. It tells the drycleaner that the garment is not safe to clean in conventional drycleaning machines and they need to seek an outside service or additional training to satisfy their customers request. Well label leather goods, with the statement “Dryclean Only by Professional Leather cleaner”, protects customer experience. A poor cleaning experience with a leather good, may lead the consumer not purchase a leather garment as a result of a drycleaner cleaning a leather garment by conventional drycleaning. A good customer experience will help the drycleaner retain their customers. Overall, a good customer experience is critical to the drycleaning industry and the leather apparel industry.

The PLCA asks the FTC for a suggestion to the leather apparel industry that all leather goods should require a more specific care label, such as, “Leather Clean and Refinish by Professional Leather Cleaner Only .” This clarification will protect thousands of small businesses and consumers by ensuring a good experience and good results with their leather goods.

The PLCA requests there to be an expansion of the definition in the glossary of terms, *16 CFR Part 423 Appendix A, 8. Leather and Suede Cleaning: a. “Leather Clean” - have cleaned on;y by a professional cleaner who uses special leather or suede care methods.* The PLCA believes expanding this term to read “Leather Clean and Refinish by Professional Leather Cleaner Only. The expansion of this term protects the drycleaner from miscleaning a leather garment., protects the consumer from mistakes and will protect the manufacture from claims of a misleading care label. Leather requires more than just cleaning. Leather and suede do not have colorfastness like that of fabric garments. The professional leather cleaner cleans leather and suede, but also uses finishing techniques, like a tannery, to restore color and feel to a leather or suede garment. The professional leather cleaner also uses special pressing techniques to restore a garment to designers intend dimensions and feel. A requirement to include more than “Dryclean Only,” on leather garments will benefit the consumer, the drycleaner and the manufacture.

What modifications should be made to the Rule as to the results of impending changes in technology?

The current definition of drycleaning is very limiting. The drycleaning industry has developed viable alternatives that provide a satisfactory cleaning process. Drycleaners are selecting more alternatives when purchasing new machinery do to increases in regulation of old technologies and the advancement in greener cleaning mediums.

Does the rule conflict with other federal or state laws or regulations?

The Care Label Rule conflicts with state laws that call for a ban on Perchloroethylene, a common drycleaning solvent.

Are there any foreign or international laws, regulations or standards that should be enforced?

Cleaning professionals often accept garments that have been purchased outside the U.S. It would be very helpful if the care instructions found on foreign and domestic labels were in agreement or at a minimum contain symbols from the ASTM.

Should the Rule include Professional Wetcleaning?

The PCLA believes in the development of better technologies to clean customer's garments. We do not have a position on adding professional wetcleaning to a care label. We believe that the industry does not have enough cleaners trained in the proper processing of wetclean only labeling. Every member of our association uses wetcleaning and has extensive training in this process. But, to include wetcleaning on a label you must include drying instructions that are much more detailed than the current instructions. For example, some items can be safely wetcleaned and dried, some items can not be dried without the possibility of adverse effects, such as shrinkage, other items may need to be dried to a certain humidity level in the machine. While we agree with adding this option to care labels at some point, we believe there would confusion among drycleaners who are not properly trained to professionally wetclean and confusion with the consumer who may believe their home machine is capable of performing the stated instructions.

Should the Rule address the development of ASTM care symbols?

The ASTM care symbols are very helpful to the industry and can aid when care label text is written in a foreign language, not understood by the drycleaner. It also aids when the text of the care label is not clear in its verbiage. The symbol is another source of information about caring for that garment.

The Professional Leather Cleaners Association appreciates the opportunity to comment on the Care Label Rule. Thank you for accepting our comments.

Please visit our website <http://www.professionalleathercleaners.org> for links directly to our members websites or you can contact our acting chairperson at 1-800-232-0792 or email at jeff@professionalleathercleaners.org.

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