



**INTERNATIONAL**  
Standards Worldwide

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September 6, 2011

Federal Trade Commission  
Office of the Secretary  
Room H-113 (Annex A)  
600 Pennsylvania, N.W.  
Washington, DC 20580

Dear Sir/Madam:

Enclosed is a letter from ASTM International's Committee D13 on Textiles in response to the Federal Trade Commission's request for public comment on the Care Labeling Rule, 16 CFR Part 423, Project No. R511915. Please give the letter your careful review and attention.

The attached letter was written by the Chairman of D13.62 on Care Labeling and the contents were approved by both Subcommittee D13.62 and the D13.90 Executive Subcommittee for submission.

Committee D13 is one of over 140 ASTM technical committees composed of experts who represent producer, user, consumer, government and academic stakeholder interests in the development on voluntary consensus standards for materials, products, systems and services. Committee D13 adheres to well-regarded, industry-recognized, and time-tested principles for the development of consensus standards that reflect current technology and industry practice.

ASTM International is one of the world's largest voluntary standards development organizations. More than 12,000 ASTM standards, which address health, safety and the environment, are published annually. The standards, and related technical information, are widely used throughout the world as a basis of purchasing and other contracts, codes and regulations.

If you have any questions regarding this matter, please contact me at 610-832-9598 or [jthomas@astm.org](mailto:jthomas@astm.org).

Sincerely,

A handwritten signature in blue ink, appearing to be 'J. Thomas'.

James A. Thomas

cc: J. Rodgers



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September 6, 2011

Federal Trade Commission  
Office of the Secretary  
Room H-113 (Annex A)  
600 Pennsylvania, N.W.  
Washington, DC 20580

Re: Care Labeling Rule, 16 CFR Part 423, Project No. R511915

Dear Sir/Madam:

In response to the Federal Trade Commission's request for public comment on the Care Labeling Rule, 16 CFR Part 423, Project No. R511915, ASTM asks that the references to ASTM standard D5489 "Standard Guide for Care Symbols for Care Instructions on Textile Products" include the most updated version of the standard.

Currently, the Care Labeling Rule allows only for the utilization of the 1996 version of ASTM International's care symbols, as contained in ASTM D5489-96c "Standard Guide for Care Symbols for Care Instructions on Textile Products". The FTC should modify Rule with the most updated version of ASTM's uniform system of care symbols, preferably excluding a year date as ASTM D5489, to meet industry needs and for ease of access to the symbols.

ASTM standards, known for their high technical quality, provide reliable physical and chemical requirements. ASTM International reviews each ASTM standard at least once every five years to ensure that its technical documents continue to meet industry needs and reflect the "state of the art." ASTM committees can also revise standards more frequently in response to new information, materials, or technologies.

ASTM standards have titles with year designations which refer to a specific edition of the standard, e.g., "-07" for 2007. Federal agencies may reference ASTM standards without including this year designation in order to designate that the most current version of the standard should be used; for example, by citing "ASTM D5489" instead of "ASTM D5489-07." While this type of reference may not always suit an agency's regulatory objective, we urge the Federal Trade Commission to consider this approach whenever updating an ASTM standard used in regulation.

Additionally, ASTM D5489-07 serves as an international standard as defined by the WTO TBT Agreement. As a signatory to the WTO TBT Agreement, the U.S. Government is pledged to use international standards as the basis for technical regulations whenever possible. The utilization of international standards like ASTM D5489-07 eliminates barriers to trade because they are rooted in the principles of consensus, openness, and assistance to others.

Appendix A of the FTC Rule shows some discrepancies when compared to ASTM D5489. This may cause confusion in the industry when deciding Care Labels. By referencing the most updated version of ASTM D5489-07, the U.S. Government continues to foster and support a public/private partnership in standards development. U.S. companies of all sizes invest their technical resources in the development of standards that match their interest and business objectives. Barriers to the acceptance of current standards, like regulations utilizing outdated standards, impair industry's ability to develop and employ them. As a result, the companies are most affected through the need for additional product testing or possibly the need for product redesign to achieve their desired market access.

The FTC inquired whether the Rule should address care instructions disclosed in languages other than English. ASTM International's standards, like ASTM D5489-07, are available in several other languages, including Russian, Spanish, Chinese, French, French Canadian and German. Through the development of a uniform system of symbols in ASTM D5489-07 and its availability in multiple languages, US retailers are better able to expand their markets. ASTM encourages the FTC to work with ASTM to continue to meet the needs of US businesses in international markets through the development of a foreign language tools like a multiple country language guide.

ASTM International is pleased for the opportunity to provide comments about the utilization of the most updated version of ASTM D5489-07 as the FTC continues its important review of the Care Labeling Rule. ASTM International would welcome the opportunity to provide the FTC with up-to-date information about our standards and collaborate with the FTC to develop a multiple country language guide. We would thus appreciate your help identifying an appropriate FTC contact person to provide guidance on an ongoing basis. Additionally, ASTM International encourages FTC representatives to participate directly in the technical committees that develop and maintain the ASTM standards used by the Commission.

Thank you for your consideration. If you have any questions, please do not hesitate to contact Jen Rodgers by e-mail, [jrodgers@astm.org](mailto:jrodgers@astm.org), or phone (610) 832-9694.

Sincerely,

Ellen Roaldi  
D13.62 Care Labeling, Subcommittee Chair