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Submitted Electronically

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Division of Enforcement
Bureau of Consumer Protection
Federal Trade Commission
Office of the Secretary, Room H-113 (Annex A)
600 Pennsylvania Ave., NW
Washington, DC 20580

<https://ftcpublish.commentworks.com/ftc/carelabelinganpr>

Re: AHAM Comments on the Care Labeling Rule, 16 C.F.R. Part 423, Project No. R511915

Dear Mr. Frisby:

The Association of Home Appliance Manufacturers (AHAM) respectfully submits the following comments to the Federal Trade Commission (FTC) on its Advance Notice of Proposed Rulemaking on the Care Labeling Rule, 16 C.F.R., Part 423 (Project No. R511915), 76 Fed. Reg. 41148 (July 13, 2011).

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's more than 150 members employ tens of thousands of people in the U.S. and produce more than 95% of the household appliances shipped for sale within the U.S. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

I. Professional Wetcleaning

FTC asked whether it should modify the care labeling rule to address the use of professional wetcleaning. AHAM urges FTC to gather consumer data before determining whether or not to adopt such amendments. For example, data should be gathered on whether consumers know the difference between professional wetcleaning and professional dry cleaning. It is possible that many consumers may not know what professional wetcleaning is or where to find a professional

wetcleaner. Furthermore, data could be gathered as to whether professional wetcleaners identify themselves as such, or whether they are more often identified, for example, as professional cleaners that provide an “environmentally friendly” cleaning service. This data will help FTC determine whether amendments to the rule that address the use of professional wetcleaning would be meaningful to the consumer.

II. Disclosures in Languages Other Than English

FTC sought comment on whether it should modify the care labeling rule to address disclosure of care instructions in languages other than English. AHAM notes that the care label is small and already has several requirements for what it must contain. Thus, adding a requirement to provide disclosure of care instructions in multiple languages would overcrowd the label. Furthermore, the iconography already on the label should help to overcome some language barriers. Instead of requiring disclosure of care instructions in multiple languages on the care label itself, AHAM suggests that FTC could provide on its website a “key”—i.e., the various care icons with the accompanying instructions in English and other languages could appear on the website. This would allow consumers to access additional information should they require it and would broaden such access by providing the information in multiple languages.

III. Care Labeling in Other Countries

FTC asked whether there are foreign or international laws, regulations, or standards with respect to care labeling that FTC should consider as it reviews its rule. Global harmonization should be a goal—it decreases burden and increases clarity and transparency when requirements are the same across geographies. AHAM suggests that FTC compare the U.S. iconography with that used in other countries and determine whether harmonization is possible. In doing this analysis, FTC should consult with ASTM to determine if any differences between ASTM D5489-07 and international icons can or should be reconciled (or alternatively, if there are reasons for any existing differences).

AHAM appreciates the opportunity to submit these comments on the FTC’s Advance Notice of Proposed Rulemaking on the Care Labeling Rule and would be glad to further discuss this matter should you request.

Respectfully Submitted,

Jennifer Cleary
Director, Regulatory Affairs