



July 3, 2013

Federal Trade Commission  
Textile Rules, 16 CFR  
Part 303, Project No. P948404

To Whom It May Concern:

We, The Hosiery Association (THA) are writing to you to comment on your proposed rule 16 CFR Part 303 Rules and Regulations Under the Textile Fiber Products Identification Act. THA is a 108 year old trade organization that has been solving problems for its member companies (all categories of legwear makers, marketers, distributors, sellers and suppliers to the business) and served as the backbone for the legwear industry. THA is the only non-profit trade association exclusively representing the specific needs of legwear companies that produce and sell more than 90 percent of the products in the US.

Our members are always striving to provide their customers with added value, while trying to keep prices down. Our consumers are extremely price sensitive. Consequently, any anticipated additional costs are reviewed with great care in order to determine what benefits would result to the consumer.

This is especially true in the infant toddler segment. Infant and toddler products have a very short life-span. Products for the infant and toddler markets are quickly outgrown, easily soiled and frequently replaced. Retailers who sell these products are under great pressure to deliver quality products at a reasonable and affordable price. Families with young children are already under tremendous economic pressure. Regulations that impose additional costs without conferring commensurate benefits to the consumer ignores the economic realities face by the typical buyer of our products.

Moreover, in our industry, our consumers are always asking for more environmentally friendly products; this means products with less packaging. It becomes very difficult logistically to include additional information for a product when the consumer wants less and less packaging. Regulators should always take into consideration cost and operational issues such as this when writing new rules for our industry.

With specific reference to this proposed rule, we do not believe, for example, that it is necessary to label a product "exclusive of decoration" or other similar description. As trimmings are in minor proportion – by definition – to the rest of the product or garment, it can be safely assumed that the consumer will correctly surmise, given no additional information, that fiber content markings refer to the basic product, not including the trimmings.

We thank you for your consideration of our comments and would urge you to contact THA if you are interested in discussing our position further.

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Sally F. Kay, THA President & CEO