



Your comment was submitted successfully!

The **Federal Trade Commission** (FTC) Proposed Rule: **Rules and Regulations under the Wool Products Labeling Act of 1939**

For related information, [Open Docket Folder](#) 



Your Receipt

**Your Comment Tracking
Number: 1jx-88uj-l1vq**

Your comment will be viewable on Regulations.gov after the agency has reviewed it, which may be an indefinite amount of time. Use your tracking number to find out the status of your comment.

Your comment:

Comment:

November 20, 2013

Federal Trade Commission
Office of the Secretary
Room H-113 (Annex Q)
600 Pennsylvania Avenue NW.
Washington, DC 20580.

Dear Sir or Madam:

Wool Rules, 16 CFR Part 300, Project No. P124201

I write in response to the notice in the Federal Register September 20, 2012, (78 FR 57808) Rules and Regulations Under the Wool Products Labeling Act of 1939; Notice of proposed rulemaking. Agathon Associates consults internationally to the textile, apparel, and related industries in matters relating to federal regulations regarding textiles, apparel, and related consumer products. I have current clients with direct material interest in the Wool Rules.

When the review of the Wool Rules was announced joint textile industry

comments were submitted by the American Manufacturing Trade Action Coalition, American Sheep Industry Association, Cashmere and Camel Hair Manufacturers Institute, the National Council of Textile Organizations, and the National Textile Association. I am pleased to see that the Proposed Rule incorporates some of those recommendations in whole or in part. I am pleased that the Commission has agreed that there is a continuing need for the Wool Rules and that the Rules need to be updated to implement the Wool Suit Fabric Labeling Fairness and International Standards Conforming Act.

I agree with the Commission's clarification that hair of a cashmere goat that does not meet the Act's definition of cashmere is to be labeled "wool." The Commission's Proposed Rule puts an end to confusion in the trade regarding this matter. I am pleased that in the case of the "Super" numbers correlating to the fiber diameter of very fine wools the Commission accepted industry recommendation that no deviations or tolerances be established.

Regarding the Commission's questions 2(A) through (C), relating to the "Super" numbers, I agree with and support the positions taken in the joint industry comments recently submitted, or about to be submitted, by the Cashmere and Camel Hair Manufacturers Institute, the International Wool Textile Organisation, and the National Council of Textile Organizations.

Thank you for your consideration of these comments.

Yours,

David Trumbull
Principal, Agathon Associates
6 Beacon Street, Suite 715
Boston MA 02108
617-237-6008
david@agathonassociates.com

Uploaded File(s) (Optional)

No files uploaded

This information will appear on
Regulations.gov:

First Name: David
Country: United States
Last Name: Trumbull
State or Province:

This information will **not** appear on
Regulations.gov:

ZIP/Postal Code: 02108
Email

MA

Address:

david@agathon
associates.com