



## Association of Textile, Apparel & Materials Professionals

4/10/2014

Robert M. Frisby, Assistant Director  
Bureau of Consumer Protection  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Dear Mr. Assistant Director,

Thanks for inviting me to participate in the reasonable basis session FTC roundtable discussion on home laundering temperatures. I enjoyed the support given by roundtable discussion participants (especially Seemanta Mitra, Intertek Testing Services and Stacy Sopcich, Green Earth). As per my comments during the session and our discussion afterwards, I recommend adding the following paragraph in 16CFR, Part 423.9 Page No. 401, after paragraph (g):

(h) The Standardization of Home Laundry Test Conditions Monograph (M6) developed by American Association of Textile Chemist & Colorists (AATCC) may be used as a supplement to refer a range of washing temperatures available in today's consumer laundering machines. It should be noted that these temperatures fall within the tolerance range specified in section 423.2.d of 16 CFR. This monograph may be obtained from the AATCC website:

<http://www.aatcc.org/testing/supplies/docs/205-M06.pdf> or may be reviewed at the Federal Trade Commission, room 130, 600 Pennsylvania Avenue, NW, Washington DC.

Addition of this paragraph will enable proper implementation of 16CFR Part 423 using AATCC's M6 which will benefit both textile manufacturers and consumers alike.

Sincerely yours,

(Mir AAR Quddus, PhD)  
Chairman, RA88 Subcommittee  
American Association of Textile Chemists & Colorists

### Attachments

1. AATCC Monograph M6 - 2013
2. FTC-AATCC Temperature comparison table