



Professional Wet Cleaners Associations, Inc.

1464 Cary Avenue

San Mateo, CA 94401

Federal Trade Commission

601 New Jersey Avenue, NW

Washington, D.C. 20001

April 09, 2014

Dear Federal Trade Commission,

Thank you for the opportunity to speak at the Care Label Roundtable Discussion this past March. It was a pleasure and honor to represent our industry at such a monumental and important gathering.

For nearly two decades now, Professional Wet Cleaning, which is a water-based system, has been able to process garments successfully. Cleaning garments in water is a practice that predates ancient times. However, in recent years, it has been technologically refined into a sophisticated process that achieves what solvents have been doing, but more effectively. In recent years, Wet Cleaning has become so popular that many solvent-using dry cleaners have become "*closet wet cleaners*" in that they have added merely a premiere washer into their premises and have proclaimed themselves as wet cleaners. This category of pseudo wet cleaners is a whole separate topic of discussion. Nonetheless, this substantiates the point that Professional Wet Cleaning is a process that many garment care professionals are realizing is the next chapter of garment care and that it is permanently here to stay.

As the FTC is probably well aware, Professional Wet Cleaners in the State of California alone process a combined total of **5 MILLION** pieces of garments **ANNUALLY**. Professional Wet Cleaners throughout the country process garments ranging from high-end couture clothing for Hollywood stars, airline companies, and to military bases. This demonstrates how widespread Professional Wet Cleaning has become as such cleaners across the country continue to grow in revenue and popularity!

Although there was much heated opposition from the Dry Cleaning industry, California was the first state to recognize the problematic environmental issues of solvents and to proactively make positive changes. Other states have since followed suit. Certain cities such as San Francisco and Santa Monica, actively propose that Professional Wet Cleaning should be the “only” alternative to Perchloroethylene and other solvents. There is no “perfect” system of dry cleaning, but research and evidence has proven that Professional Wet Cleaning is the safest and best alternative for consumers to care for their garments in many aspects. By **mandating** Professional Wet Cleaning on care labels, a truthful and complete disclosure will be made to the consumers, and the FTC will have fulfilled its role and responsibility to the public to protect it from misleading and deceptive information.

Sincerely,

/s/

Augustine Chang

President