

SUSTAINABLE TECHNOLOGY & POLICY PROGRAM
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Donald S. Clark
Secretary of the Commission
Federal Trade Commission
600 Pennsylvania Ave., NW
Washington, DC 20580

April 11, 2014

TO: Federal Trade Commission

FROM: Peter Sinsheimer, Ph.D., MPH., Executive Director, UCLA Sustainable Technology & Policy Program

RE: Appendix to Additional Comment on September 20, 2012 Notice of Proposed Rulemaking for Care Labeling Rule, 16 CFR Part 423, Project No. R511915

This document is an appendix to the additional comments provided in April 11, 2014.

The appendix includes the following documents:

- (1) Harris Methodology
- (2) Harris Consumer Questionnaire
- (3) Frequency Table of All Respondents
- (4) Frequency Table of Consumer Respondents – exclude respondents who did not use professional cleaning services for garments typically labeled ‘Dry Clean’ or ‘Dry Clean Only’
- (5) UCLA Professional Wetcleaner Questionnaire
- (6) Comment on Proposed Changes to Reasonable Basis

Harris Methodology

MEMO



To: Peter Sinsheimer - UCLA
From: Regina Corso, Harris Interactive
Date: April 10, 2014
Re: Methodology Statement

Peter,

Below is the methodology statement for the survey.

Full Methodology

This survey was conducted online within the United States between September 18 and 20, 2013 among 2,000 adults aged 18 and older, of whom 809 ever take garments labeled 'dry clean' to a professional cleaner by Harris Interactive on behalf of UCLA via its Quick Query omnibus product. Figures for age, sex, race/ethnicity, education, region and household income were weighted where necessary to bring them into line with their actual proportions in the population. Propensity score weighting was used to adjust for respondents' propensity to be online.

All sample surveys and polls, whether or not they use probability sampling, are subject to multiple sources of error which are most often not possible to quantify or estimate, including sampling error, coverage error, error associated with nonresponse, error associated with question wording and response options, and post-survey weighting and adjustments. Therefore, Harris Interactive avoids the words "margin of error" as they are misleading. All that can be calculated are different possible sampling errors with different probabilities for pure, unweighted, random samples with 100% response rates. These are only theoretical because no published polls come close to this ideal.

Respondents for this survey were selected from among those who have agreed to participate in Harris Interactive surveys. The data have been weighted to reflect the composition of the adult population. Because the sample is based on those who agreed to participate in the Harris Interactive panel, no estimates of theoretical sampling error can be calculated.

Harris Consumer Questionnaire

UCLA QUESTIONS

BASE: U.S. RESPONDENTS (Q2109/244)

Q3005 How frequently do you take garments typically labeled 'Dry Clean' to a professional cleaner?

- 01 More than once a week
- 02 Once a week
- 03 Twice a month
- 04 Once a month
- 05 A couple of times a year
- 06 Once a year
- 07 Less than once a year
- 08 Never

BASE: U.S. RESPONDENTS (Q2109/244)

Q3010 The "care label" on a garment provides information about how the garment can be cleaned.

When you see a garment with a care label that says 'Dry Clean' what do you think it means?

- 1 Dry cleaning is the only method for cleaning the garment.
- 2 Dry cleaning is the recommended method for cleaning the garment.
- 3 Dry cleaning is just one reliable method for cleaning the garment but other methods may also be appropriate.
- 8 Don't know

BASE: U.S. RESPONDENTS (Q2109/244)

Q3015 Have you ever heard of "professional wet cleaning"?

- 1 Yes
- 2 No
- 8 Not sure

BASE: U.S. RESPONDENTS (Q2109/244)

Q3018 For the next few questions please read and consider the following information.

"Professional wet cleaning" is an alternative to dry cleaning and involves professional cleaners using water and special technology to clean garments typically labeled 'Dry Clean' or 'Dry Clean Only.'

The United States Environmental Protection Agency (EPA) has encouraged dry cleaners to add or switch to professional wet cleaning because the process is non-toxic, eliminating the use of dry clean chemicals used at most cleaners that the agency considers to be harmful to human health and the environment.

University research has shown that cleaners making the switch are able to successfully wet clean the full range of 'Dry Clean' and 'Dry Clean Only' garments they previously dry cleaned and do so at a comparable cost.

The Federal Trade Commission (FTC), which considers professional wet cleaning an environmentally friendly alternative to dry cleaning, has proposed adding a new 'Professional Wet Clean' care label.

[Please click the forward arrow to continue.](#)

BASE: U.S. RESPONDENTS (Q2109/244)

Q3019 HIDDEN QUESTION - DO NOT SHOW ON SCREEN - concept randomization

[RANDOMLY SELECT ONE FOR USE]

- 1 'Professional Wet Clean or Dry Clean'
- 2 'Dry Clean or Professional Wet Clean'

BASE: U.S. RESPONDENTS (Q2109/244)

Q3020 Imagine you owned a garment labeled [SHOW SELECTION FROM Q3019], and the quality and cost of the two cleaning methods were the same. Which of these two professional cleaning methods would you prefer using for this garment?

[ROTATE ORDER; 1,2,8 & 2,1,8]

- 1 Dry cleaning
- 2 Professional wet cleaning
- 8 Not sure

[PROGRAMMER: IF WOULD PREFER PROFESSIONAL WET CLEAN (Q3020/2) ASK Q3025; ELSE (Q3020/1,8) JUMP TO Q3035]

BASE: WOULD PREFER PROFESSIONAL WET CLEAN (Q3020/2)

Q3025 How significant, if at all, is avoiding the environmental and human health impacts of dry cleaning in your preference for professional wet cleaning?

[ROTATE ORDER; 1,2,3,4 & 4,3,2,1]

- 1 Not at all significant
- 2 Somewhat significant
- 3 Fairly significant
- 4 Very significant

BASE: WOULD PREFER PROFESSIONAL WETCLEAN (Q3020/2)

Q3030 If the cleaner(s) you typically use were not able to professionally wet clean a garment you owned that was labeled [SHOW SELECTION FROM Q3019], how willing, if at all, would you be to use a different cleaner which was able to professionally wet clean this garment (instead of dry cleaning it) if the price, quality, and location of this cleaner were comparable to the cleaner(s) you typically use?

[ROTATE ORDER; 1,2,3,4 & 4,3,2,1]

- 1 Very willing
- 2 Somewhat willing
- 3 Somewhat unwilling
- 4 Very unwilling

BASE: U.S. RESPONDENTS (Q2109/244)

Q3035 Which of the following garment care labels would make you more likely to want to professionally wet clean a garment?

[RANDOMIZE]

- 1 'Dry Clean'
- 2 [SHOW SELECTION FROM Q3019]
- 7 It doesn't make a difference to me. ANCHOR

BASE: U.S. RESPONDENTS (Q2109/244)

Q3040 In the future, you may see some garments labeled [SHOW SELECTION FROM Q3019] and other garments labeled 'Dry Clean.' If this was the case, and you saw a garment with a 'Dry Clean' care label, would you think it means...?

[ROTATE ORDER SHOWN, 1,2,3 OR 3,2,1]

- 1 Dry cleaning is the only method for cleaning the garment.
- 2 Dry cleaning is the recommended method for cleaning the garment.
- 3 Dry cleaning is just one reliable method for cleaning the garment but other methods may be appropriate.
- 8 Not sure ANCHOR

BASE: U.S. RESPONDENTS (Q2109/244)

Q3045 If a garment could be safely professionally wet cleaned or dry cleaned but the garment was only labeled 'Dry Clean', would you consider the 'Dry Clean' care label on this garment to be?

[RANDOMIZE]

- 1 Acceptable, since it provides me useful information about one cleaning method. ANCHOR AT TOP
- 2 Misleading, since the care label leaves out another acceptable professional cleaning method.
- 3 Unfair, since the label omits useful information that I would have used to choose an environmentally friendly cleaning method.
- 4 Both misleading and unfair. ANCHOR
- 7 No opinion ANCHOR

BASE: U.S. RESPONDENTS (Q2109/244)

Q3050 Because professional wet cleaning is a new professional cleaning method, it may cost more for a garment manufacturer to determine whether a garment could carry a 'Professional Wet Clean' label.

When paying for a garment at a retail store, how much more would you be willing to pay for the garment to determine whether it could carry a 'Professional Wet Clean' label?

[ROTATE ORDER 01-07, 07-01]

- 01 I would not be willing to pay any more at all for the garment.
- 02 1 cent
- 03 5 cents
- 04 10 cents
- 05 25 cents
- 06 1 dollar
- 07 More than 1 dollar

Frequency Table of All Respondents

WetCleaningCodebook.log

Harris-UCLA Consumer Survey:
Frequency Table of all respondents

 name: <unnamed>
 log: D:\data\Malloy\WetCleaning2013\output\WetCleaningCodebook.log
 log type: text
 opened on: 24 Sep 2013, 10:09:56

. codebook

 SC_ID Survey ID.

type: numeric (double)
 range: [2646,6318] units: 1
 unique values: 2000 missing.: 0/2000
 mean: 4279.97
 std. dev: 970.644
 percentiles: 10% 25% 50% 75% 90%
 2899.5 3287.5 4374 5070.5 5408.5

 Q3 Q3 Respondent ID.

type: numeric (double)
 range: [182581,60790671] units: 1
 unique values: 1674 missing.: 0/2000
 mean: 3.5e+07
 std. dev: 2.0e+07
 percentiles: 10% 25% 50% 75% 90%
 1.2e+07 1.9e+07 3.0e+07 6.0e+07 6.1e+07

 Q75 Q75 (QV7) SAMPLE SUPPLIER

type: numeric (double)
 label: Q75
 range: [1,990] units: 1
 unique values: 2 missing.: 0/2000
 tabulation: Freq. Numeric Label
 1952 1 HPOL
 48 990 Survey Router Federated

 Q3005 Q3005 How frequently do you take
 garments typically labeled 'Dry Clean'
 to a pro

type: numeric (double)
 Page 1

WetCleaningCodebook.log

Label: Q3005
range: [1,8] units: 1
unique values: 8 missing :: 0/2000

tabulation:	Freq.	Numeric	Label
	26	1	More than once a week
	55	2	Once a week
	83	3	Twice a month
	135	4	Once a month
	358	5	A couple of times a year
	133	6	Once a year
	401	7	Less than once a year
	809	8	Never

Q3010 Q3010 The ''care label'' on a garment provides information about how the garment

type: numeric (double)
label: Q3010
range: [1,8] units: 1
unique values: 4 missing :: 0/2000

tabulation:	Freq.	Numeric	Label
	840	1	Dry cleaning is the only method for cleaning the garment.
	938	2	Dry cleaning is the recommended method for cleaning the garment.
	143	3	Dry cleaning is just one reliable method for cleaning the garment but other meth
	79	8	Don't know

Q3015 Q3015 Have you ever heard of ''professional wet cleaning''?

type: numeric (double)
label: Q3015
range: [1,8] units: 1
unique values: 3 missing :: 0/2000

tabulation:	Freq.	Numeric	Label
	190	1	Yes
	1648	2	No
	162	8	Not sure

Q3019 Q3019 Concept randomization

type: numeric (double)
label: Q3019
range: [1,2] units: 1
unique values: 2 missing :: 0/2000

tabulation:	Freq.	Numeric	Label

WetCleaningCodebook.log

997 1 'Professional Wet Clean or Dry Clean'
 1003 2 'Dry Clean or Professional Wet Clean'

Q3020 Q3020 Imagine you owned a garment labeled ..., and the quality and cost of the t

type: numeric (double)
 label: Q3020
 range: [1,8] units: 1
 unique values: 3 missing :: 0/2000

tabulation:	Freq.	Numeric	Label
	353	1	Dry cleaning
	1000	2	Professional wet cleaning
	647	8	Not sure

Q3025 Q3025 How significant, if at all, is avoiding the environmental and human health

type: numeric (double)
 label: Q3025
 range: [1,4] units: 1
 unique values: 4 missing :: 1000/2000

tabulation:	Freq.	Numeric	Label
	29	1	Not at all significant
	170	2	Somewhat significant
	297	3	Fairly significant
	504	4	Very significant
	1000	.	

Q3030 Q3030 If the cleaner(s) you typically use were not able to professionally wet cl

type: numeric (double)
 label: Q3030
 range: [1,4] units: 1
 unique values: 4 missing :: 1000/2000

tabulation:	Freq.	Numeric	Label
	513	1	Very willing
	346	2	Somewhat willing
	81	3	Somewhat unwilling
	60	4	Very unwilling
	1000	.	

Q3035 Q3035 which of the following garment care labels would make you more likely

wetCleaningCodebook.log
to w

type: numeric (double)
label: Q3035
range: [1,7] units: 1
unique values: 3 missing :: 0/2000

tabulation:	Freq.	Numeric	Label
	91	1	'Dry Clean'
	1146	2	Professional Wet Clean or Dry Clean/Dry Clean or Professional Wet Clean
	763	7	It doesn't make a difference to me.

Q3040 Q3040 In the future, you may see some garments labeled ... and other garments
1a

type: numeric (double)
label: Q3040
range: [1,8] units: 1
unique values: 4 missing :: 0/2000

tabulation:	Freq.	Numeric	Label
	412	1	Dry cleaning is the only method for cleaning the garment.
	874	2	Dry cleaning is the recommended method for cleaning the garment.
	547	3	Dry cleaning is just one reliable method for cleaning the garment but other meth
	167	8	Not sure

Q3045 Q3045 If a garment could be safely professionally wet cleaned or dry cleaned but

type: numeric (double)
label: Q3045
range: [1,7] units: 1
unique values: 5 missing :: 0/2000

tabulation:	Freq.	Numeric	Label
	515	1	Acceptable, since it provides me useful information about one cleaning method.
	660	2	Misleading, since the care label leaves out another acceptable professional clea
	199	3	Unfair, since the label omits useful information that I would have used to choos
	314	4	Both misleading and unfair.
	312	7	No opinion

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WetCleaningCodebook.log

Q3050 Q3050 Because professional wet cleaning
is a new professional ... when paying fo

type: numeric (double)
label: Q3050
range: [1,7] units: 1
unique values: 7 missing.: 0/2000

tabulation:	Freq.	Numeric	Label
	1251	1	I would not be willing to pay any more at all for the garment.
	33	2	1 cent
	78	3	5 cents
	61	4	10 cents
	168	5	25 cents
	266	6	1 dollar
	143	7	More than 1 dollar

Q4005 Q4005 Are you...?

type: numeric (double)
label: Q4005
range: [1,2] units: 1
unique values: 2 missing.: 0/2000

tabulation:	Freq.	Numeric	Label
	859	1	Male
	1141	2	Female

Q4007 Q4007 what is your age?

type: numeric (double)
range: [18,93] units: 1
unique values: 72 missing.: 0/2000

mean: 49.7935
std. dev: 17.0488

percentiles:	10%	25%	50%	75%	90%
	25	35	53	63	71

Q2102M1 Q2102M1 2 years old or younger: Q2102
Are you the parent/legal guardian of any
c

type: numeric (double)
label: Q2102M1
range: [0,1] units: 1
unique values: 2 missing.: 0/2000

tabulation: Freq. Numeric Label
 1886 0 No
 114 1 Yes

Q2102M2 Q2102M2 3-5 years old: Q2102 Are you the parent/legal guardian of any child/chil

type: numeric (double)
 label: Q2102M2
 range: [0,1] units: 1
 unique values: 2 missing .. 0/2000
 tabulation: Freq. Numeric Label
 1898 0 No
 102 1 Yes

Q2102M3 Q2102M3 6-9 years old: Q2102 Are you the parent/legal guardian of any child/chil

type: numeric (double)
 label: Q2102M3
 range: [0,1] units: 1
 unique values: 2 missing .. 0/2000
 tabulation: Freq. Numeric Label
 1879 0 No
 121 1 Yes

Q2102M4 Q2102M4 10-12 years old: Q2102 Are you the parent/legal guardian of any child/ch

type: numeric (double)
 label: Q2102M4
 range: [0,1] units: 1
 unique values: 2 missing .. 0/2000
 tabulation: Freq. Numeric Label
 1909 0 No
 91 1 Yes

Q2102M5 Q2102M5 13-17 years old: Q2102 Are you the parent/legal guardian of any child/ch

type: numeric (double)
 label: Q2102M5
 range: [0,1] units: 1
 unique values: 2 missing .. 0/2000
 tabulation: Freq. Numeric Label

WetCleaningCodebook.log

1829 0 No
171 1 Yes

Q2102M7 Q2102M7 I am not the parent/legal guardian of any child under 18 years old who i

type: numeric (double)
label: Q2102M7
range: [0,1] units: 1
unique values: 2 missing .. 0/2000
tabulation: Freq. Numeric Label
412 0 No
1588 1 Yes

Q2107 Q2107 Age Category.

type: numeric (double)
label: Q2107
range: [3,13] units: 1
unique values: 11 missing .. 0/2000
examples: 6 30-34
9 45-49
11 55-59
13 65 and over

Q2108 Q2108 Sex And Age Categories Combined.

type: numeric (double)
label: Q2108
range: [3,26] units: 1
unique values: 22 missing .. 0/2000
examples: 11 Males 55-59
13 Males 65 and over
19 Females 30-34
24 Females 55-59

Q2109 Q2109 In what country or region do you currently reside?

type: numeric (double)
label: Q2109
range: [244,244] units: 1
unique values: 1 missing .. 0/2000
tabulation: Freq. Numeric Label
2000 244 United States

Q2112

Q2112 what type of Internet connection do you have for your home computer or oth

type: numeric (double)
 label: Q2112
 range: [1,98] units: 1
 unique values: 10 missing .: 0/2000
 examples: 6 Cable modem
 6 Cable modem
 9 ADSL/DSL
 96 Other

Q2113

Q2113 Excluding email, how many hours a week do you spend on the Internet or wor

type: numeric (double)
 range: [0,168] units: 1
 unique values: 65 missing .: 0/2000
 mean: 20.584
 std. dev: 16.9539
 percentiles: 10% 25% 50% 75% 90%
 5 10 18 25 40

Q2115M1

Q2115M1 Smartphone (e.g., Apple iPhone, Android phone, Blackberry): Q2115 which

type: numeric (double)
 label: Q2115M1
 range: [0,1] units: 1
 unique values: 2 missing .: 0/2000
 tabulation: Freq. Numeric Label
 1031 0 No
 969 1 Yes

Q2115M2

Q2115M2 Standard mobile phone (i.e., a phone mainly for calls and/or texting; no

type: numeric (double)
 label: Q2115M2
 range: [0,1] units: 1
 unique values: 2 missing .: 0/2000
 tabulation: Freq. Numeric Label
 1138 0 No
 862 1 Yes

WetCleaningCodebook.log

 Q2115M3 Q2115M3 Tablet (e.g., Apple iPad, Amazon Kindle Fire, Motorola Xoom, Samsung Gal

 type: numeric (double)
 label: Q2115M3
 range: [0,1] units: 1
 unique values: 2 missing .: 0/2000
 tabulation: Freq. Numeric Label
 1392 0 No
 608 1 Yes

 Q2115M4 Q2115M4 eReader (e.g., basic Amazon Kindle, Nook): Q2115 which of the following

 type: numeric (double)
 label: Q2115M4
 range: [0,1] units: 1
 unique values: 2 missing .: 0/2000
 tabulation: Freq. Numeric Label
 1633 0 No
 367 1 Yes

 Q2115M6 Q2115M6 Other mobile device(s): Q2115 which of the following types of mobile dev

 type: numeric (double)
 label: Q2115M6
 range: [0,1] units: 1
 unique values: 2 missing .: 0/2000
 tabulation: Freq. Numeric Label
 1873 0 No
 127 1 Yes

 Q2115M7 Q2115M7 None: Q2115 which of the following types of mobile devices, if any, do y

 type: numeric (double)
 label: Q2115M7
 range: [0,1] units: 1
 unique values: 2 missing .: 0/2000
 tabulation: Freq. Numeric Label
 1819 0 No
 181 1 Yes

WetCleaningCodebook.log

Q2135 Q2135 what is your marital status?

type: numeric (double)
label: Q2135
range: [1,6] units: 1
unique values: 6 missing .. 0/2000

tabulation:	Freq.	Numeric	Label
	987	1	Married
	515	2	Single, never married
	229	3	Divorced
	32	4	Separated
	109	5	Widowed
	128	6	Living with partner

Q2138 Q2138 Including you, how many adults
(age 18 or over) live in this household?

type: numeric (double)
range: [1,20] units: 1
unique values: 9 missing .. 0/2000

tabulation:	Freq.	Value
	551	1
	1070	2
	254	3
	90	4
	26	5
	5	6
	2	7
	1	11
	1	20

Q2141 Q2141 How many children under the age of 18 live in this household?

type: numeric (double)
range: [0,8] units: 1
unique values: 8 missing .. 0/2000

tabulation:	Freq.	Value
	1525	0
	247	1
	145	2
	59	3
	19	4
	3	5
	1	6
	1	8

Q2143A1 Q2143 Age of Child 1.

type: numeric (double)

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range: [0,99] units: 1
unique values: 19 missing .: 1525/2000
mean: 11.0737
std. dev: 13.4865
percentiles: 10% 25% 50% 75% 90%
1 4 10 15 17

Q2143A2 Q2143 Age of Child 2.

type: numeric (double)
range: [0,99] units: 1
unique values: 19 missing .: 1772/2000
mean: 10.4298
std. dev: 12.7845
percentiles: 10% 25% 50% 75% 90%
3 5 9 13.5 15

Q2143A3 Q2143 Age of Child 3.

type: numeric (double)
range: [0,99] units: 1
unique values: 18 missing .: 1917/2000
mean: 9
std. dev: 14.8915
percentiles: 10% 25% 50% 75% 90%
1 3 7 10 14

Q2143A4 Q2143 Age of Child 4.

type: numeric (double)
range: [0,99] units: 1
unique values: 14 missing .: 1976/2000
mean: 11.2917
std. dev: 19.3536
percentiles: 10% 25% 50% 75% 90%
1 3 7 12:5 16

Q2143A5 Q2143 Age of Child 5.

type: numeric (double)
range: [1,99] units: 1
unique values: 5 missing .: 1995/2000

WetCleaningCodebook.log

```

tabulation: Freq. Value
              1 1
              1 5
              1 6
              1 17
              1 99
            1995 .
    
```

Q2143A6

Q2143 Age of Child 6.

```

type: numeric (double)
range: [1,99]
unique values: 2
units: 1
missing ..: 1998/2000

tabulation: Freq. Value
              1 1
              1 99
            1998 .
    
```

Q2143A7

Q2143 Age of child 7.

```

type: numeric (double)
range: [99,99]
unique values: 1
units: 1
missing ..: 1999/2000

tabulation: Freq. Value
              1 99
            1999 .
    
```

Q2143A8

Q2143 Age of Child 8.

```

type: numeric (double)
range: [99,99]
unique values: 1
units: 1
missing ..: 1999/2000

tabulation: Freq. Value
              1 99
            1999 .
    
```

Q2143A9

Q2143 Age of Child 9.

```

type: numeric (double)
range: [.,.]
unique values: 0
units: .
missing ..: 2000/2000

tabulation: Freq. Value
            2000 .
    
```

Q2143A10

Q2143 Age of child 10.

wetCleaningCodebook.log

type: numeric (double)
range: [.,.]
unique values: 0 units: .
missing .: 2000/2000
tabulation: Freq. Value
2000 .

Q2143A11 Q2143 Age of Child 11.

type: numeric (double)
range: [.,.]
unique values: 0 units: .
missing .: 2000/2000
tabulation: Freq. Value
2000 .

Q2143A12 Q2143 Age of Child 12.

type: numeric (double)
range: [.,.]
unique values: 0 units: .
missing .: 2000/2000
tabulation: Freq. Value
2000 .

Q2143A13 Q2143 Age of Child 13.

type: numeric (double)
range: [.,.]
unique values: 0 units: .
missing .: 2000/2000
tabulation: Freq. Value
2000 .

Q2143A14 Q2143 Age of Child 14.

type: numeric (double)
range: [.,.]
unique values: 0 units: .
missing .: 2000/2000
tabulation: Freq. Value
2000 .

Q2143A15 Q2143 Age of Child 15.

type: numeric (double)
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range: [0,1] units: 1
unique values: 2 missing .. 0/2000

tabulation:	Freq.	Numeric	Label
	1949	0	No
	51	1	Yes

Q2149M7 Q2149 Not employed, unable to work due to a disability or illness: Q2149 what is

type: numeric (double)
label: Q2149M7

range: [0,1] units: 1
unique values: 2 missing .. 0/2000

tabulation:	Freq.	Numeric	Label
	1891	0	No
	109	1	Yes

Q2149M6 Q2149 Retired: Q2149 what is your employment status?

type: numeric (double)
label: Q2149M6

range: [0,1] units: 1
unique values: 2 missing .. 0/2000

tabulation:	Freq.	Numeric	Label
	1496	0	No
	504	1	Yes

Q2149M8 Q2149 Student: Q2149 what is your employment status?

type: numeric (double)
label: Q2149M8

range: [0,1] units: 1
unique values: 2 missing .. 0/2000

tabulation:	Freq.	Numeric	Label
	1887	0	No
	113	1	Yes

Q2149M9 Q2149 Homemaker: Q2149 what is your employment status?

type: numeric (double)
label: Q2149M9

range: [0,1] units: 1
unique values: 2 missing .. 0/2000

tabulation:	Freq.	Numeric	Label
	1814	0	No

Q2157 Q2157 which of the following income categories best describes your total 2012 ho

type: numeric (double)
label: Q2157
range: [1,99] units: 1
unique values: 12 missing .: 0/2000
examples: 2 \$15,000 to \$24,999
4 \$35,000 to \$49,999
5 \$50,000 to \$74,999
6 \$75,000 to \$99,999

Q2159 Q2159 Many households have money that they invest for many purposes. Excluding a

type: numeric (double)
label: Q2159
range: [1,99] units: 1
unique values: 13 missing .: 0/2000
examples: 1 Less than \$10,000
2 \$10,000 to \$24,999
5 \$100,000 to \$249,999
98 Not sure

Q2160 Q2160 In what state or territory do you currently reside?

type: numeric (double)
label: Q2160
range: [101,151] units: 1
unique values: 51 missing .: 0/2000
examples: 110 Florida
121 Maryland
133 New York
139 Pennsylvania

Q2163 Q2163 what is your zip code?

type: numeric (double)
range: [1028,99827] units: 1
unique values: 1815 missing .: 0/2000
mean: 48243.5
std. dev: 28880.8

Frequency Table of Consumer Respondents

wetCleaning-woNever ver2.log

Harris-UCLA Consumer Survey:
 Frequency Table of Respondents who used professional cleaning services
 (Omits 809 respondents who did not use professional cleaning services)

 name: <unnamed>
 log: D:\data\Malloy\wetCleaning2013\output\wetCleaning-woNever.log
 log type: text
 opened on: 24 Sep 2013, 10:51:44

- . preserve
- . drop if Q3005 == 8
 (809 observations deleted)
- . codebook

 SC_ID Survey ID.

type: numeric (double)
 range: [2646,6318] units: 1
 unique values: 1191 missing.: 0/1191
 mean: 4253.87
 std. dev: 980.28
 percentiles: 10% 25% 50% 75% 90%
 2870 3260 4347 5050 5390

 Q3 Q3 Respondent ID.

type: numeric (double)
 range: [366341,60790671] units: 1
 unique values: 1000 missing.: 0/1191
 mean: 3.5e+07
 std. dev: 2.0e+07
 percentiles: 10% 25% 50% 75% 90%
 1.1e+07 1.7e+07 2.9e+07 6.0e+07 6.1e+07

 Q75 Q75 (QV7) SAMPLE SUPPLIER

type: numeric (double)
 label: Q75
 range: [1,990] units: 1
 unique values: 2 missing.: 0/1191
 tabulation: Freq. Numeric Label
 1155 1 HPOL
 36 990 Survey Router Federated

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Q3005 Q3005 How frequently do you take garments typically labeled 'Dry Clean' to a pro

type: numeric (double)
label: Q3005
range: [1,7] units: 1
unique values: 7 missing .: 0/1191

tabulation:	Freq.	Numeric	Label
	26	1	More than once a week
	55	2	Once a week
	83	3	Twice a month
	135	4	Once a month
	358	5	A couple of times a year
	133	6	Once a year
	401	7	Less than once a year

Q3010 Q3010 The ''care label'' on a garment provides information about how the garment

type: numeric (double)
label: Q3010
range: [1,8] units: 1
unique values: 4 missing .: 0/1191

tabulation:	Freq.	Numeric	Label
	524	1	Dry cleaning is the only method for cleaning the garment.
	591	2	Dry cleaning is the recommended method for cleaning the garment.
	67	3	Dry cleaning is just one reliable method for cleaning the garment but other meth
	9	8	Don't know

Q3015 Q3015 Have you ever heard of ''professional wet cleaning''?

type: numeric (double)
label: Q3015
range: [1,8] units: 1
unique values: 3 missing .: 0/1191

tabulation:	Freq.	Numeric	Label
	139	1	Yes
	939	2	No
	113	8	Not sure

Q3019 Q3019 Concept randomization

type: numeric (double)
Page 2

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label: Q3019
range: [1,2] units: 1
unique values: 2 missing : 0/1191
tabulation: Freq. Numeric Label
599 1 'Professional wet Clean or Dry
Clean'
592 2 'Dry Clean or Professional wet
Clean'

Q3020 Q3020 Imagine you owned a garment
labeled ..., and the quality and cost of
the t

type: numeric (double)
label: Q3020
range: [1,8] units: 1
unique values: 3 missing : 0/1191
tabulation: Freq. Numeric Label
218 1 Dry cleaning
659 2 Professional wet cleaning
314 8 Not sure

Q3025 Q3025 How significant, if at all, is
avoiding the environmental and human
health

type: numeric (double)
label: Q3025
range: [1,4] units: 1
unique values: 4 missing : 532/1191
tabulation: Freq. Numeric Label
14 1 Not at all significant
118 2 Somewhat significant
203 3 Fairly significant
324 4 Very significant
532 .

Q3030 Q3030 If the cleaner(s) you typically
use were not able to professionally wet
cl

type: numeric (double)
label: Q3030
range: [1,4] units: 1
unique values: 4 missing : 532/1191
tabulation: Freq. Numeric Label
338 1 Very willing
229 2 Somewhat willing
52 3 Somewhat unwilling

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40 4 Very unwilling
532 .

Q3035

Q3035 which of the following garment care labels would make you more likely to w

type: numeric (double)
label: Q3035
range: [1,7] units: 1
unique values: 3 missing :: 0/1191

tabulation:	Freq.	Numeric	Label
	64	1	'Dry Clean'
	767	2	Professional Wet Clean or Dry Clean/Dry Clean or Professional Wet Clean
	360	7	It doesn't make a difference to me.

Q3040

Q3040 In the future, you may see some garments labeled ... and other garments la

type: numeric (double)
label: Q3040
range: [1,8] units: 1
unique values: 4 missing :: 0/1191

tabulation:	Freq.	Numeric	Label
	249	1	Dry cleaning is the only method for cleaning the garment.
	548	2	Dry cleaning is the recommended method for cleaning the garment.
	343	3	Dry cleaning is just one reliable method for cleaning the garment but other meth
	51	8	Not sure

Q3045

Q3045 If a garment could be safely professionally wet cleaned or dry cleaned but

type: numeric (double)
label: Q3045
range: [1,7] units: 1
unique values: 5 missing :: 0/1191

tabulation:	Freq.	Numeric	Label
	332	1	Acceptable, since it provides me useful information about one cleaning method.
	428	2	Misleading, since the care label leaves out another acceptable

```

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136      3  professional clea
          3  Unfair, since the label omits
          4  useful information that I would
          4  have used to choos
          4  Both misleading and unfair.
175      4
120      7  No opinion

```

```

-----
Q3050      Q3050 Because professional wet cleaning
           is a new professional ... when paying fo
-----

```

```

           type: numeric (double)
           label: Q3050
           range: [1,7]
unique values: 7
           units: 1
           missing : 0/1191
           tabulation:
Freq.      Numeric  Label
657        1  I would not be willing to pay
           2  any more at all for the garment.
22         2  1 cent
50         3  5 cents
49         4  10 cents
122        5  25 cents
195        6  1 dollar
96         7  More than 1 dollar

```

```

-----
Q4005      Q4005 Are you...?
-----

```

```

           type: numeric (double)
           label: Q4005
           range: [1,2]
unique values: 2
           units: 1
           missing : 0/1191
           tabulation:
Freq.      Numeric  Label
544        1  Male
647        2  Female

```

```

-----
Q4007      Q4007 what is your age?
-----

```

```

           type: numeric (double)
           range: [18,88]
unique values: 70
           units: 1
           missing : 0/1191
           mean: 50.89
           std. dev: 16.9589
           percentiles:
10%      25%      50%      75%      90%
26       36       54       64       71

```

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-----
Q2102M1    Q2102M1 2 years old or younger: Q2102
           Are you the parent/legal guardian of any
           c
-----

```


label: Q2102M5 wetCleaning-wonEver ver2.log
range: [0,1] units: 1
unique values: 2 missing.: 0/1191
tabulation: Freq. Numeric Label
1087 0 No
104 1 Yes

Q2102M7 Q2102M7 I am not the parent/legal guardian of any child under 18 years old who i

type: numeric (double)
label: Q2102M7
range: [0,1] units: 1
unique values: 2 missing.: 0/1191
tabulation: Freq. Numeric Label
248 0 No
943 1 Yes

Q2107 Q2107 Age Category.

type: numeric (double)
label: Q2107
range: [3,13] units: 1
unique values: 11 missing.: 0/1191
examples: 6 30-34
9 45-49
11 55-59
13 65 and over

Q2108 Q2108 Sex And Age Categories Combined.

type: numeric (double)
label: Q2108
range: [3,26] units: 1
unique values: 22 missing.: 0/1191
examples: 10 Males 50-54
13 Males 65 and over
19 Females 30-34
24 Females 55-59

Q2109 Q2109 In what country or region do you currently reside?

type: numeric (double)
label: Q2109
range: [244,244] units: 1

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unique values: 2 missing .: 0/1191

tabulation:	Freq.	Numeric	Label
	683	0	No
	508	1	Yes

Q2115M3 Q2115M3 Tablet (e.g., Apple iPad, Amazon Kindle Fire, Motorola Xoom, Samsung Gal

type: numeric (double)
label: Q2115M3

range: [0,1] units: 1
unique values: 2 missing .: 0/1191

tabulation:	Freq.	Numeric	Label
	783	0	No
	408	1	Yes

Q2115M4 Q2115M4 eReader (e.g., basic Amazon Kindle, Nook): Q2115 which of the following

type: numeric (double)
label: Q2115M4

range: [0,1] units: 1
unique values: 2 missing .: 0/1191

tabulation:	Freq.	Numeric	Label
	925	0	No
	266	1	Yes

Q2115M6 Q2115M6 Other mobile device(s): Q2115 which of the following types of mobile dev

type: numeric (double)
label: Q2115M6

range: [0,1] units: 1
unique values: 2 missing .: 0/1191

tabulation:	Freq.	Numeric	Label
	1112	0	No
	79	1	Yes

Q2115M7 Q2115M7 None: Q2115 which of the following types of mobile devices, if any, do y

type: numeric (double)
label: Q2115M7

range: [0,1] units: 1

WetCleaning-woNever ver2.log
unique values: 2 missing .: 0/1191

tabulation:	Freq.	Numeric	Label
	1113	0	No
	78	1	Yes

Q2135 Q2135 what is your marital status?

type: numeric (double)
label: Q2135
range: [1,6] units: 1
unique values: 6 missing .: 0/1191

tabulation:	Freq.	Numeric	Label
	636	1	Married
	289	2	Single, never married
	123	3	Divorced
	18	4	Separated
	64	5	Widowed
	61	6	Living with partner

Q2138 Q2138 Including you, how many adults
(age 18 or over) live in this household?

type: numeric (double)
range: [1,7] units: 1
unique values: 7 missing .: 0/1191

tabulation:	Freq.	Value
	317	1
	663	2
	143	3
	47	4
	16	5
	3	6
	2	7

Q2141 Q2141 How many children under the age of 18 live in this household?

type: numeric (double)
range: [0,8] units: 1
unique values: 8 missing .: 0/1191

tabulation:	Freq.	Value
	908	0
	152	1
	82	2
	34	3
	11	4
	2	5
	1	6
	1	8

Q2143A1

Q2143 Age of Child 1.

```

type: numeric (double)
range: [0,99]
unique values: 19
mean: 10.8693
std. dev: 12.0139
percentiles: 10% 25% 50% 75% 90%
              1 4 11 15 17
units: 1
missing :: 908/1191
    
```

Q2143A2

Q2143 Age of Child 2.

```

type: numeric (double)
range: [0,99]
unique values: 19
mean: 9.68702
std. dev: 9.21294
percentiles: 10% 25% 50% 75% 90%
              3 5 9 14 15
units: 1
missing :: 1060/1191
    
```

Q2143A3

Q2143 Age of Child 3.

```

type: numeric (double)
range: [0,99]
unique values: 17
mean: 10.7143
std. dev: 18.9088
percentiles: 10% 25% 50% 75% 90%
              1 3 7 10 14
units: 1
missing :: 1142/1191
    
```

Q2143A4

Q2143 Age of Child 4.

```

type: numeric (double)
range: [1,99]
unique values: 11
mean: 13.4
std. dev: 24.0707
percentiles: 10% 25% 50% 75% 90%
              3 3 7 12 17
units: 1
missing :: 1176/1191
    
```

Q2143A5

Q2143 Age of Child 5.

```

type:      wetCleaning-woNever ver2.log
           numeric (double)
range:     [1,99]
unique values: 4
units:     1
missing .. 1187/1191

tabulation: Freq. Value
              1 1
              1 5
              1 6
              1 99
            1187 .

```

Q2143A6 Q2143 Age of Child 6.

```

type:      numeric (double)
range:     [1,99]
unique values: 2
units:     1
missing .. 1189/1191

tabulation: Freq. Value
              1 1
              1 99
            1189 .

```

Q2143A7 Q2143 Age of Child 7.

```

type:      numeric (double)
range:     [99,99]
unique values: 1
units:     1
missing .. 1190/1191

tabulation: Freq. Value
              1 99
            1190 .

```

Q2143A8 Q2143 Age of Child 8.

```

type:      numeric (double)
range:     [99,99]
unique values: 1
units:     1
missing .. 1190/1191

tabulation: Freq. Value
              1 99
            1190 .

```

Q2143A9 Q2143 Age of Child 9.

```

type:      numeric (double)
range:     [.,.]
unique values: 0
units:     .
missing .. 1191/1191

tabulation: Freq. Value
            1191 .

```

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Q2143A10 Q2143 Age of Child 10.

type: numeric (double)
range: [.,.]
unique values: 0 units: .
missing :: 1191/1191
tabulation: Freq. Value
1191 .

Q2143A11 Q2143 Age of Child 11.

type: numeric (double)
range: [.,.]
unique values: 0 units: .
missing :: 1191/1191
tabulation: Freq. Value
1191 .

Q2143A12 Q2143 Age of Child 12.

type: numeric (double)
range: [.,.]
unique values: 0 units: .
missing :: 1191/1191
tabulation: Freq. Value
1191 .

Q2143A13 Q2143 Age of Child 13.

type: numeric (double)
range: [.,.]
unique values: 0 units: .
missing :: 1191/1191
tabulation: Freq. Value
1191 .

Q2143A14 Q2143 Age of Child 14.

type: numeric (double)
range: [.,.]
unique values: 0 units: .
missing :: 1191/1191
tabulation: Freq. Value
1191 .

Q2143A15 Q2143 Age of child 15.

Q2149M1 Q2149 Employed full time: Q2149 what is your employment status?

type: numeric (double)
 label: Q2149M1
 range: [0,1]
 unique values: 2
 units: 1
 missing :: 0/1191
 tabulation:

Freq.	Numeric	Label
772	0	No
419	1	Yes

Q2149M2 Q2149 Employed part time: Q2149 what is your employment status?

type: numeric (double)
 label: Q2149M2
 range: [0,1]
 unique values: 2
 units: 1
 missing :: 0/1191
 tabulation:

Freq.	Numeric	Label
1037	0	No
154	1	Yes

Q2149M3 Q2149 Self-employed: Q2149 what is your employment status?

type: numeric (double)
 label: Q2149M3
 range: [0,1]
 unique values: 2
 units: 1
 missing :: 0/1191
 tabulation:

Freq.	Numeric	Label
1096	0	No
95	1	Yes

Q2149M4 Q2149 Not employed, but looking for work: Q2149 what is your employment status?

type: numeric (double)
 label: Q2149M4
 range: [0,1]
 unique values: 2
 units: 1
 missing :: 0/1191
 tabulation:

Freq.	Numeric	Label
1112	0	No
79	1	Yes

Q2149M5 Q2149 Not employed and not looking for work: Q2149 what is your employment statu

WetCleaning-woNever ver2.log

tabulation: Freq. Numeric Label
 1094 0 No
 97 1 Yes

Q2157 Q2157 which of the following income
 categories best describes your total
 2012 ho

 type: numeric (double)
 label: Q2157

 range: [1,99] units: 1
unique values: 12 missing .: 0/1191

 examples: 3 \$25,000 to \$34,999
 4 \$35,000 to \$49,999
 5 \$50,000 to \$74,999
 6 \$75,000 to \$99,999

Q2159 Q2159 Many households have money that
 they invest for many purposes. Excluding
 a

 type: numeric (double)
 label: Q2159

 range: [1,99] units: 1
unique values: 13 missing .: 0/1191

 examples: 1 Less than \$10,000
 3 \$25,000 to \$49,999
 5 \$100,000 to \$249,999
 98 Not sure

Q2160 Q2160 In what state or territory do you currently reside?

 type: numeric (double)
 label: Q2160

 range: [101,151] units: 1
unique values: 51 missing .: 0/1191

 examples: 110 Florida
 122 Massachusetts
 133 New York
 140 Rhode Island

Q2163 Q2163 what is your zip code?

 type: numeric (double)

 range: [1028,99611]
unique values: 1101 units: 1
 missing .: 0/1191


```

          wetCleaning-woNever ver2.log
label:   Q60
  range: [1,1]
unique values: 1
                    units: 1
                    missing .: 0/1191

tabulation: Freq.   Numeric   Label
            1191       1   Qualified Respondent, Quota Not
                               Met

```

```

propwts
Capped prop wts

```

```

      type: numeric (double)
  range:   [.20005,5]
unique values: 1025
                    units: .00001
                    missing .: 0/1191

      mean: 1.02962
  std. dev: .984514

percentiles:      10%      25%      50%      75%      90%
                  .27549  .40412  .69107  1.21447  2.15248

```

```

. restore
. log close
  name: <unnamed>
  log:  D:\data\Malloy\wetCleaning2013\output\wetCleaning-woNever.log
  log type: text
  closed on: 24 Sep 2013, 10:51:44

```

**UCLA Professional Wetcleaner
Questionnaire**

UCLA Sustainable Technology & Policy Program: Field Survey of Professional Wetcleaners on Professional Wetclean Practice

- Introduction
 - What we are doing: Survey of professional wet cleaners to understand their experience and expertise in professional wet cleaning garments labeled 'Dryclean' or 'Dryclean Only'
 - What this is for: The FTC is deciding whether to allow or require a new 'PWC' label. They want information on the experience and expertise of PWCers
 - Choose to participate: Your participation in this survey voluntary
 - We won't use your name until you say it is ok

- Explanation to each section
 - The survey is broken up into sections
 - The first section focuses on the PWC equipment you have and how you use it
 - The next section focuses on the garments you can successfully wet clean
 - The next section focuses on quality control and what you do to assure the success when PWCing garments
 - The next section focuses on the garments you reject and the garment you have ruined
 - The final sections focus on your expertise in predicting the garments that can be successfully PWCed.

[Section Explanation: Selection Criteria Verification]

The first set of questions provides us background information.

Main Criteria	Sub-Criteria	Measurement Criteria	Response	Notes
Selection Criteria				
	Are you currently a dedicated PWCer – use on other cleaning system other than PWC to process garments?			
	Where is your cleaner located?	Address		
		Median income		Median income (STPP only)
	How many years did you operated as a dry cleaner?	Yrs		
	When did you switch to PWCing?	Year		
		Yrs		
	Did you receive PWC training when you converted?	[Yes/No]		

[Section Explanation: PWC Equipment]

The second set of questions has to do with the cleaning equipment installed at your cleaners.

Main Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Measurement Criteria	Response	Notes
PWC equipment	Washer						
		Manufacturer			[Name]		
		Model number			[Name]		
		Capacity	Laundry		Lb		
			PWC		Lb		
	Auto det disp system				[Name]		
	Detergent						
		Detergent			[Name]		Verify with ISO – nonionic type C13
		Conditioner			[Name]		
		Sizing			[Name]		
	Soft water system				Yes/No		
	Dryer				[Name]		
		Manufacturer			[Name]		
		Capacity			Lb		
	Finishing equipment	Iron			[Name]		(specific to ISO)
		Steam press			[Name]		
		Pressing table			[Name]		
		Steaming on a mannequin or in a cabinet	Tensioning Form finisher		[Name]		
			Tensioning pants topper		[Name]		

[Section Explanation: PWC Washer Programs]

The third set of questions has to do with the washer programs you use and how you operate your dryer.

Main Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Measure Criteria	Response	Notes
PWC wash programs						
	When running a PWC program, how much do you fill washer drum with items to be cleaned?		% of load capacity	% (range)		ISO 3175-4: 9.2.1
	Do you always use your automatic deterg disp?		Detergent mixing	Yes/No		ISO 3175-4: 9.2.4
	Do you always transfer garments from washer to an empty dryer?					
	How many different washer programs PWCing do you use? (Prompt for PWC-n)					
	Program 1	Garment types				
		Shell fiber types				
	Program 2	Garment types				
		Shell fiber types				
	Program 3	Garment types				
		Shell fiber types				
	Program 4	Garment types				
		Shell fiber types				

[Section Explanation: Operation of Washer and Dryer]

The next set of questions has to do with the operation of the PWC washer and dryers for each specific program. Let's start with Program [#], used for [Read garment types and fiber types]. (Note separate page for each major program)

Main Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Measurement Criteria	Response	Notes
Operation of W & D	Program 1						(Verify garment type and fiber)
		Wash process		Wash	° F/°C		ISO 3175-4: Annex B
				Water level	L/M/H		ISO 3175-4: Annex B
		Dry process	Machine drying	Load capacity	%		ISO 3175-4: Table A.2
				Drying Temp	° F/°C (range)		ISO 3175-4: Table 1
				Amount dried	% dry (range)		ISO 3175-4: 3.7
					# minutes (range)		ISO 3175-4: Table 1
			Air dry	% air dried after mach dry			
				Procedure for air drying	Woven: hung Knit: flat surface		
	ISO specs internal compare)		PWC-normal				ISO 3175-4: 9.1 (use ISO 6330 programme 6A)
			PWC-mild				ISO 3175-4: Table 1
			PWC-v mild				ISO 3175-4: Table 1

[Section Explanation: Operation of Washer and Dryer]

The next set of questions has to do with the operation of the PWC washer and dryers for each specific program. Let's start with Program [#], used for [Read garment types and fiber types]. (Note separate page for each major program)

Main Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Measurement Criteria	Response	Notes
Operation of W & D	Program 2						(Verify garment type and fiber)
		Wash process		Wash	° F/°C		ISO 3175-4: Annex B
				Water level	L/M/H		ISO 3175-4: Annex B
		Dry process	Machine drying	Load capacity	%		ISO 3175-4: Table A.2
				Drying Temp	° F/°C (range)		ISO 3175-4: Table 1
				Amount dried	% dry (range)		ISO 3175-4: 3.7
					# minutes (range)		ISO 3175-4: Table 1
			Air dry	% air dried after mach dry			
				Procedure for air drying	Woven: hung Knit: flat surface		
	ISO specs internal compare)		PWC-normal				ISO 3175-4: 9.1 (use ISO 6330 programme 6A)
			PWC-mild				ISO 3175-4: Table 1
			PWC-v mild				ISO 3175-4: Table 1

[Section Explanation: Operation of Washer and Dryer]

The next set of questions has to do with the operation of the PWC washer and dryers for each specific program. Let's start with Program [#], used for [Read garment types and fiber types]. (Note separate page for each major program)

Main Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Measurement Criteria	Response	Notes
Operation of W & D	Program 3						(Verify garment type and fiber)
		Wash process		Wash	°F/°C		ISO 3175-4: Annex B
				Water level	L/M/H		ISO 3175-4: Annex B
		Dry process	Machine drying	Load capacity	%		ISO 3175-4: Table A.2
				Drying Temp	°F/°C (range)		ISO 3175-4: Table 1
				Amount dried	% dry (range)		ISO 3175-4: 3.7
					# minutes (range)		ISO 3175-4: Table 1
			Air dry	% air dried after mach dry			
				Procedure for air drying	Woven: hung Knit: flat surface		
	ISO specs internal compare)		PWC-normal				ISO 3175-4: 9.1 (use ISO 6330 programme 6A)
			PWC-mild				ISO 3175-4: Table 1
			PWC-v mild				ISO 3175-4: Table 1

[Section Explanation: Operation of Washer and Dryer]

The next set of questions has to do with the operation of the PWC washer and dryers for each specific program. Let's start with Program [#], used for [Read garment types and fiber types]. (Note separate page for each major program)

Main Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Measurement Criteria	Response	Notes
Operation of W & D	Program 4						(Verify garment type and fiber)
		Wash process		Wash	°F/°C		ISO 3175-4: Annex B
				Water level	L/M/H		ISO 3175-4: Annex B
		Dry process	Machine drying	Load capacity	%		ISO 3175-4: Table A.2
				Drying Temp	°F/°C (range)		ISO 3175-4: Table 1
				Amount dried	% dry (range)		ISO 3175-4: 3.7.
					# minutes (range)		ISO 3175-4: Table 1
			Air dry	% air dried after mach dry			
				Procedure for air drying	Woven: hung Knit: flat surface		
	ISO specs internal compare)		PWC-normal				ISO 3175-4: 9.1 (use ISO 6330 programme 6A)
			PWC-mild				ISO 3175-4: Table 1
			PWC-v mild				ISO 3175-4: Table 1

[Section Explanation: Experience – Garments successfully cleaned]

The next set of questions has to do with the number of garments you have successfully wet cleaned.

Main Criteria	Sub-Criteria	Measure	Response	Notes
Experience				
	We're interested in knowing the number of garments of you have <i>successfully</i> PWCed since switching to PWCing. What is the total number of garments that you successfully clean per year – including dress shirts, machine washables, and delicate garments?	#/year		Could be # per month to get to #/years
	Do you process dress shirts at your cleaners?	Yes/No		
		#/year		
	Focusing on the non-dress shirt items that you <i>successfully</i> clean per year -- including both machine wash, hand wash, and dry clean labeled -- what percent of these successfully cleaned garments are labeled 'Dry Clean' or 'Dry Clean Only'?	% with DC or DCO		
	Of these non-dress shirt items that you <i>successfully</i> clean per year - what percentage of labeled 'Machine wash' but you process using one of the PWC programs?	% using PWC program machine wash		
	Of the 'Dry Clean' or 'Dry Clean Only' labeled garments of the delicate machine wash garments cleaned using one of the wet clean programs, what percentage are <i>successfully</i> cleaned using each program	Program 1%		
		Program 2%		
		Program 3%		
		Program 4%		

[Section Explanation: Experience – Quality Control]

The next set of questions has to do with the quality control procedures you put into place for maximizing success of garments professionally wet cleaned. This can include red-flagging a garment known to be challenging, identifying garments with no prior experience cleaning, testing potentially problematic garments, and identifying problems during cleaning process.

We are first interested in knowing what quality control procedures are performed. For each quality control procedure, we want to know, who performs the procedure and when in the cleaning process the procedure is performed.

Main Criteria	Sub-Criteria	Sub-Criteria	Sequence of QC	Who Conducts QC	What QC in Performed	Response	Notes
Experience							
	Quality control	Inspection procedure	Intake	Counter			Some cleaners will warn customers that garment could be ruined and have them sign a waver
			Before washing	Cleaner			
			After washing	Cleaner			
			Before drying	Cleaner			
			During drying	Cleaner			
			After drying	Cleaner			
			Before finishing	Cleaner			
			During finishing	Presser			
			After finishing	Presser			
			Before bagging	Bagger			

[Section Explanation: Experience – Criteria for identifying problems with cleaning]

The next section focuses on the assessment of specific problems you look for when inspecting garments from the time the customer brings in the garment to the time it is placed into a bag at the end of cleaning.

Main Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Measure	Response	Notes
Experience							
	Criteria for determining whether to PWC and success of PWC						(See Appendix # below) ISO 3175-1 Annex Table 1 and Annex B
		Performance of component parts, etc.	Overall visual inspection		Yes/no		
			Seam puckering		Yes/no		
			Fraying of seams		Yes/no		
			Surface abrasion		Yes/no		
			Felting ¹		Yes/no		
			Pilling ²		Yes/no		
			Creasing propensity	Creasing	Yes/no		
				Wrinkle recovery	Yes/no		
			Crease retention		Yes/no		
			Adhesion of fusible interlinings and	Delamination, blistering, deterioration of	Yes/no		

¹ **Felting** is the matting of wool fibers caused by a combination of heat, moisture, and agitation which cause the scales of the fibers to open up and lock together. Felting condenses the fibers which causes shrinkage shrink

² **Fabric pilling** is the formation of small, fuzzy balls on the surface of a fabric.

			bonded fabrics	coated, boded, laminated or fused fabrics			
		Dimensional stability			Yes/no		
			Distortion		Yes/no		
				Bow and skew ³	Yes/no		
				Puckering	Yes/no		
				Differential shrinkage	Yes/no		
		Color fastness			Yes/no		
		Handle/hand/feel			Yes/no		
		Loss of finish			Yes/no		

³ When yarns are not aligned at 90 degrees. **Bow** is created when the yarns 'dip' to form a curve in the woven fabric (no longer 90 degrees). **Skew** occurs when there is a 'slant' to the yarns along the surface of the fabric. http://www.textileprofessor.com/textileprofessor/html/wovenfabrics_overview_index.htm

[Section Explanation: Experience – Garments rejected]

The next set of questions has to do with garments that have come into your shop for cleaning that you decided you were not able to professionally wet clean. In these cases you could have told to the customer that you would be unable to clean the garment or you could have accepted the item and sent the garment out for dry cleaning. [NOTE: DO WE WANT TO ASK WHETHER THEY EVER SEND GARMENTS OUT FOR DRY CLEANING? DO WE WANT CURRENT PRACTICE OF REJECTED GARMENTS OR ALL HISTORICAL DATA?]

Main Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Measurement Criteria	Response	Notes
Experience	Garments not successfully PWCed	Rejected DC/DCO garments	Frequency	#/month		
			% subbed to DC	%		
			Types or categories of garment rejected by ISO categories	Specific garment description		(e.g. garments with press-in pleats, gabardine) Create separate chart for interviewer (see Appendix # below)
			Specific garment manufacturer	Name manuf. & specific problem		(e.g. Hugo Boss lapel lining)
			Method use to reject	(1) % Specific experience, (2) % Expertise, (3) % Field Testing (e.g. dye run on small sample)		Define terms: (1) Experience: with manu/garment, (2) Expertise: Similar class of garments (e.g. press-in pleats, (3) Filed Testing: Testing portion of garment (e.g. test for dye bleed)
			Change in frequency over time since converting?			

[Section Explanation: Experience – Garments ruined]

The next set of questions has to do with garments that have been ruined by wet cleaning the garment. For each case, we are interested in knowing the specific reason why the garment was ruined, whether you learned how to successfully process this type of garment, or whether you no longer process this type of garment. We are also interested in whether the rate of garments ruined has changed over time since you switched to professional wet cleaning.

Main Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Measurement Criteria	Response	Notes
Experience	Garments not successfully PWCed	Ruined DC/DCO garments		# (per year?, per month? Ever?)		
				Description of each garment ruined		
			Reason why garment ruined	Reclassify by ISO category		Create separate chart for interviewer (see Appendix # below)
				Manufacturer		Create separate chart for interviewer (see Appendix # below)
		Change in rate of ruined garments over time		#/year		

[Section Explanation: Expertise]

The next set of questions focuses on the expertise you have developed as a consequence of your experience as a professional wet cleaner. Specifically, we are interested in knowing your ability to predict whether a new garment that you have never seen can be successfully wet cleaned.

Main Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Measure	Response	Notes
Expertise	Ability to predict garments that can be successfully PWCed	Over last year, frequency of receiving an item with no prior experience PWCing and uncertain about success in PWC.				
		Describe item uncertainty			#/month	
			Color change	%		
			Unique material	%		
			Unique construction	%		
			Unique finish	%		
			Other	%		
			Percent you decided to PWC		%	
			Percent you decide not to PWC		%	
			Correct judgment about garments cleaned: Percent successfully PWCed		%	
			Incorrectly judgment about garments cleaned: Garment ruined or too time consuming to process		%	

[Section Explanation: Expertise]

The next set of questions focuses on using your expert judgment to assist apparel manufacturers in determining a professional wet clean label.

Main Criteria	Sub-Criteria	Sub-Criteria	Sub-Criteria	Measurement Criteria	Response	Notes
Expertise	Evaluation of PWC care label for manufacturer determining label	Applying expert judgment determining success in PWC for item sent by apparel manufacturer	Ability to use ISO quality checklist to determine whether garment can be PWCed or whether field testing required to make determination	Yes/No		ISO 3175-1:2010(E). Annex B – Example of Test Reporting
			Determine proper label: PWC-n PWC-m PWC-vm do not PWC	Yes/No		
		Cost of making expert judgment		\$		
		Willingness to provide this service to apparel manufacturers		Yes/No		

[Section Explanation: Expertise]

The last set of questions focuses on using your ability to conduct field-based testing for apparel manufacturers in determining a professional wet clean label.

Main Criteria	Sub-Criteria	Sub-Criteria	Measurement Criteria	Response	Notes
Field Testing and Evaluation	Ability to test if apparel manufacturer wished to conduct field-based cleaning test and evaluation	Develop cleaning protocol for test item (washing program, drying process, finishing process)	Yes/No		
		Fill out form specifying protocol	Yes/No		
		Conduct repeat clean test (3 cleanings)	Yes/No		
		Evaluate results based on ISO endpoints (compare with uncleaned garment)	Yes/No		
		Determine proper label: PWC-n, PWC-m, PWC-vm, do not PWC	Yes/No		
	Cost of completing field testing and evaluation		\$/test		
	Cost of completing filed testing and send test garments to lab or back to manufacture for evaluation		\$/test		
	Willingness to provide this service to apparel manufacturers		Yes/No		

Comment on Proposed Changes to Reasonable Basis

SUSTAINABLE TECHNOLOGY & POLICY PROGRAM
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Secretary of the Commission
Federal Trade Commission
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Washington, DC 20580

April 11, 2014

TO: FTC

FROM: Peter Sinsheimer, Ph.D., MPH, Executive Director, UCLA Sustainable Technology & Policy Program

RE: Additional Comment on Reasonable Basis Associated with September 20, 2012 Notice of Proposed Rulemaking for Care Labeling Rule, 16 CFR Part 423, Project No. R511915 and Discussed at March 28, 2014 Roundtable

With respect to the clarification of the reasonable basis requirements, it is essential that the examples used for when testing may be required should be based on reliable evidence of field-based failure. The examples provided in the NPR appear to be based on reliable evidence of field-based failure – specifically: (i) The color of one part often bleeds onto another when the finished garment is washed; (ii) A dye that is known to bleed, or beads, buttons, or sequins that are known to be damaged often in drycleaning are used; or (iii) A garment contains several fibers, fabrics, or components not previously used together (p. 58351).

That said, the November 2012 comment by Green Earth on the NPR recommended added the following example: “a garment contains water soluble dyes, wool, natural fiber or skins when wet cleaning is the recommended cleaning method.” There does not appear to be any reliable evidence of systematic field-based failure associated with this claim. In fact, field-based experience, expertise, and analysis does not suggest these issues to create systemic failure in professional wet cleaning.