

July 31, 2017

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue NW
Suite CC-5610 (Annex C)
Washington, DC 20580

RE: Request for Comments on FTC Proposal to Change the Rules and Regulations Under the Textile Fiber Products Identification Act, FTC-2017-0046-0001

To Whom It May Concern:

Thank you for the opportunity to comment. The American Apparel & Footwear Association strongly supports the Federal Trade Commission's (FTC) proposal to delete the requirement that an owner of a registered word trademark furnish the FTC with a copy of the mark's registration with the United States Patent and Trademark Office (USPTO) before using the mark on labels, and to no longer restrict the use of such trademarks to only those also employed as house marks.

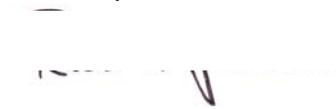
Representing more than 1,000 world famous name brands, the American Apparel & Footwear Association (AAFA) is the trusted public policy and political voice of the U.S. apparel and footwear industry, its management and shareholders, its nearly four million U.S. workers, and its contribution of \$384 billion in annual U.S. retail sales.

AAFA fully agrees with the FTC's assessment that eliminating the requirement in 16 CFR 303.19(a) that businesses furnish the Commission with registered word trademarks prior to using these marks will "reduce compliance costs while increasing firms' flexibility." By simplifying the rule, however marginally, this change would also eliminate confusion, both for the business community and for consumers. In fact, technological advances that make the FTC and the Patent and Trademark Office (PTO) databases fully searchable from just about anywhere on the planet, combined with consumers' easy access to these online resources, have now rendered this provision obsolete.

The FTC proposal is a real, impactful step towards the FTC's goal to "eliminate or change outdated, unnecessary regulations and processes." The FTC should implement the proposal immediately.

Thank you for your time and consideration in this matter. Please contact AAFA's Nate Herman at 202-853-9351, nherman@aafaglobal.org if you have questions or would like additional information.

Sincerely,



Rick Helfenbein
President and CEO, AAFA