



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Office of Commissioner  
Rohit Chopra

**To:** April Tabor

**From:** Maria Bazan

**Date:** September 15, 2020

**Re:** Care Labeling Rule NPRM: Comments to be placed on the public record

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On September 8, 2020, Commissioner Chopra, Erie Meyer, and I met with Mary Scalco, CEO of the Drycleaning & Laundry Institute (DLI) regarding the Federal Trade Commission's Notice of Proposed Rulemaking regarding the repeal of the Care Labeling Rule.

During the call, Ms. Scalco noted that there was no mention or proposal to remove care labeling altogether when the Commission previously conducted roundtables on the rule. She emphasized that care labels are an essential tool for dry cleaners, as many within the industry rely on them for guidance on how to treat their customers' garments. She noted that it is not always evident which procedure should be used to clean a specific item just from reading the list of textiles it contains because differences in composition can affect how fabrics react to certain chemicals.

The DLI is concerned that repealing the Care Labeling Rule would expose dry cleaners to additional liability when clothes are damaged. When something happens to a garment during the cleaning process, consumers typically turn to the last person who handled the item, even in cases where the dry cleaner followed the care instructions meticulously. In these situations, care labels provide an added protection for their members because they are able to prove that the issue is with the instructions printed on the label.

Ms. Scalco warned that this increased liability could be very damaging to the DLI's members, especially now during the COVID-19 health crisis. The economic downturn, combined with reductions in public gatherings like weddings and funerals, has translated into diminished revenues because fewer customers require or seek their services.

Commissioner Chopra inquired about the owners and operators of professional cleaning establishments. Ms. Scalco noted that the majority of dry cleaners in the United States are small, family-run businesses, many of whom are minority-owned or owned by immigrants, and have fewer than five employees. These small businesses, who may already be struggling to break even while operating at a reduced capacity, would be disproportionately affected by the FTC's decision to repeal the Care Labeling Rule. She noted that this would also impact providers of wash-and-fold services.

Additionally, the DLI's membership serves frontline workers addressing the COVID-19 health crisis. Care labels help outline temperature guidance to allow cleaners to process the clothing at as high a temperature as indicated. Higher temperatures are more effective at killing viruses. Without specific care labels, the business would be guessing at how best to launder the garments, and may choose a lower temperature out of caution for not damaging them. The DLI says that their members want certainty so that they can keep their clients as safe as possible.

The DLI believes that this repeal is not in the best interest of its members, or consumers in general. The only group that may stand to benefit from this decision would be manufacturers who make low-quality clothing. Scalco noted that it was unclear whether there would be any cost savings, because manufacturers would still need to produce labels to disclose fiber content and country of origin.