

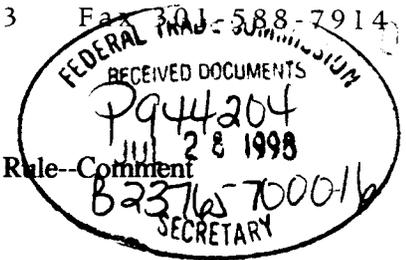
PRESTIGE...EXCEPTIONAL FABRICARE

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July 25, 1998

16 CFR Part 423--Care Labeling Rule--Comment



Secretary, Federal Trade Commission
Sixth and Pennsylvania Avenue, N. W.
Washington, D. C. 20580

The following comments on the proposed amendments to the Trade Regulation Rule on Care Labeling of Textile Wearing Apparel and Certain Piece Goods are being submitted in response to the item appearing in the Federal Register, Volume 63, No. 89, Friday, May 8, 1998:

As a hands-on owner-operator of fabricare businesses for forty seven years, I meet my public daily. I have built my businesses by listening attentively to my customers. I am a 1957 graduate of the National Institute of Drycleaning (NID) General Course; have been an active member of NID and its successor, the International Fabricare Institute (IFI) since then and have served on local and regional trade association boards, so I have a sense of the needs and concerns of the individual fabricare specialist.

I believe that the care labeling rule can serve equally the needs of the consumer, professional fabricare provider (fabricarist) and manufacturer/importer. The consumer and fabricarist each need guidance in providing safe care practices; the manufacturer/importer needs protection from costly reputation-threatening product failures and excessive merchandise returns. My comments speak to the possibilities of maximum information provision based on the most reliable evidence.

Single vs Dual Care Practice Designation

My experience as a professional fabricarist has taught me that many consumers who trust the veracity of a care label will not attempt a non-listed care practice. A single care practice designation, where alternative safe practices exist, constitutes lack of full disclosure, depriving that consumer of full freedom of choice in purchasing and in care. If home washing, drycleaning and professional wetcleaning are all viable care options, I believe that care labels should so state.

Reduction of PCE Usage

The stringency of federal regulations, the vastly improved performance of modern "perc" cleaning machines, the growth of professional wetcleaning, the use of Exxon's synthetic non-chlorinated hydrocarbon DF 2000 solvent and the possibilities of liquid carbon dioxide and/or glycol ethers as viable cleaning alternatives all combine to provide significant reduction of PCE use.

Definition of Drycleaning

The industry prefers the use of the single word drycleaning to the two separate words dry cleaning. Professional drycleaning as a process includes professional finishing. Any article care labeled as drycleanable must withstand the normal steaming required to finish it. If any component of that article fails in the finishing process, it is not safely drycleanable.

Definition of Wetcleaning

Any definition of wetcleaning should entail a description of a generic process which provides a satisfactory end result. Fabricare professionals have successfully wetcleaned for as long as there has been professional drycleaning. The emergence of modern technology has enhanced the viability of the wetcleaning service, but the satisfactory practice is not limited to the exclusive use of the modern technology, and wetcleaning should not be defined as dependent on exclusive use of that technology.

New Cleaning Technologies Kind to Clothing, Allergies, & Ecology

"Reasonable Basis for Care Instructions"

How can a "reasonable basis" be provided without testing? Has FTC ever sought or seen written evidence of "reasonable basis"? Exclusive reliance on text book or published tests would seem flawed because of obsolescence and variances in components in finished pieces.

Care Practice and Fiber Content on the Same Label

If space permits, it's a good idea. The knowledgeable consumer and fabricare professional recognize the care practice opportunities and limitations which fiber content indicates.

Descriptive Words vs Symbols Only

I want to comment on this subject even though it is not addressed in 16 CFR Part 423. It has been stated that FTC's goal is a wordless, symbols only care label. The global nature of textile production and sales supports symbols only because translation of care practices into all the world's languages would be ridiculous. No one can refute this logic, nevertheless, English is the basis for the American tongue and to serve best the needs of American consumers and professional care providers, descriptive words and symbols should be used.

Public Understanding of the Care Label Rule

Retailers, consumer groups, fabricare professionals, trade associations, fashion publications, the media, the internet, and the public schools can all be among the conduits for FTC dissemination of the care label rule. Say it with words; say it with pictures; say it through as many avenues and as repeatedly as possible. The more familiar the public and the professionals are with care labeling, the better.

I appreciate this opportunity to offer my comments and suggestions and request continued inclusion in the process which will produce an amended Trade Regulation Rule on Care Labeling of Textile Wearing Apparel and Certain Piece Goods.

Respectfully submitted,



Edward B. Boorstein
Certified Professional Drycleaner
Certified Environmental Drycleaner

The original is to be mailed today.