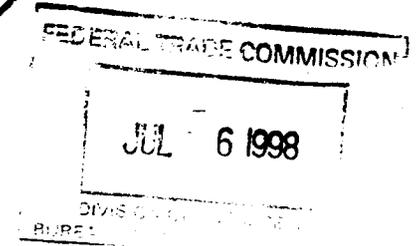




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Alliance Laundry Systems LLC
Shepard Street, P.O. Box 990
Ripon, WI 54971-0990
Tel 920.748.3121
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www.uniwash.com



July 1, 1998

Mr. James G. Mills
Federal Trade Commission
Washington, D.C. 20580

Dear Mr. Mills,

Alliance Laundry Systems is America's largest commercial laundry equipment manufacturer. Unimac is the brand that has #1 marketshare for On Premises Laundries. Included in this category are professional cleaners, where we have a substantial marketshare due to our technology driven performance. In fact, two technologies described in the amendments are items that Unimac introduced to the market and have driven our strong sales ever since (frequency drives and microprocessor controls).

Based upon the notes that you supplied me I must ask why would consideration be given to labeling for "professional wet cleaning"? The notes clearly state there are 30,000 professional cleaning facilities, yet less than 500 facilities have professional wet cleaning equipment. We are spending this amount of energy for less than 2% of the market? Even this number is grossly misleading! Has anyone asked how many of these cleaners use wet cleaning as their primary method for cleaning? Based upon my industry knowledge, I might guess less than 50 of the 500 wet cleaning machines are used in a facility as the primary cleaning machine! The other facilities most likely have a solvent based cleaning machine.

Unimac has been building a wet cleaning unit since 1994, when the roots began in Europe. Due to legislation in Germany, we sold large numbers of units in a very short period of time. Since 1996 even Germany has seen a slow growth of this cleaning method. In the states we have taken a reserved approach to marketing wet cleaning. The process has some shortcomings as proven in the three North America studies. As our enclosed marketing piece states, wet cleaning is an adjunct process to be complimented with another. Using today's available processes the only choice is solvents cleaning (dry cleaning).

Even the hearing notes state, wet cleaning is only an adjunct to solvent cleaning. Outside of two European manufacturers claims, no one has proven wet cleaning as a viable alternative. The commission's notes state a range of 25 - 75%. This includes two European agencies that have been studying wet cleaning capabilities for approximately five years. In fact the CNT and UCLA studies used the Aquaclean and Aquatex units respectively. Neither study claims to have cleaned 90% with success.

Wet cleaning has a limited role in our society. I would certainly like to see it become a larger role than it is today. It would open a new market for Unimac and help us to increase profits. I could easily agree with the statements previously stated to the commission, however they would only be self serving. Let's leave that to the politicians.

The truth of wet cleaning is it an adjunct to other cleaning methods. There are only a few locations using it as their primary cleaning method. To create special labeling at this time is premature.

I have a very strong concern for proposed amendment, Part D, subsection b, item 3. Referring to the label, "It must state at least one **type** of professional wet cleaning equipment that may be used to clean the garment. However, if the product can be successfully cleaned by all commercially available types of professional wet cleaning equipment, the label need not mention any type of wet cleaning equipment."

What's going on here? The process used by Aquaclean, Aquatex, Pellerin Milnor and Unimac are nearly identical. The largest variable is the detergent. Not one equipment manufacturer has control over which detergents are used after the machine is sold. The mechanical action, the controls, and the machines programs can all be duplicated from one machine to another, within reason! In fact, Unimac has a recirculation and filtering process that goes beyond some of the competitors methods! There is smoke all over this movement. Hopefully it will be cleared before any changes are made!

I assume "type" means brand of equipment. If this is true, an enormous burden is placed upon the garment manufacturer. Since when does the Government force equipment recommendations to be on the labels of a garment. I have yet to see Maytag's name on any washable item! I have never seen any equipment manufacturers name on a "dry clean only" garment!

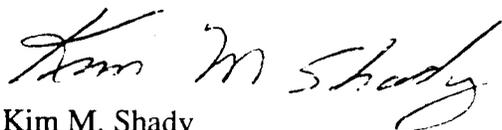
This entire process seems to be led by the wrong group of special interests. Based upon the notes, the two major representatives of professional cleaners are not the advocates of pushing these program changes. Are the cleaners themselves asking for these changes? I have never heard a consumers group ask for these changes.

The labeling changes should in theory help the professional cleaner use wet cleaning without liability for using water on a "dry clean only" garment. The fact is 99% of professional cleaners have a dry cleaning machine and will use it for garments labeled that way. Outside of the extreme environmentalist, the consumer doesn't care what process is used. They want the garment clean, well pressed and in the same or better condition than when the cleaner took possession.

I want to sell laundry equipment as much as or more than any person in the United States! The proposed amendments for garment labeling to include wet cleaning could potentially move wet cleaning sales to a somewhat faster pace. However, until solvents are banned, cleaners are not going to move quickly towards wet cleaning. In fact, our company will introduce a new, non hazardous, alternative for dry cleaning next year. Wet cleaning has a limited future as an adjunct and no future as the primary cleaning method. The studies have proven its limitations.

Care labels do not need to address wet cleaning at this time. It is wasted time for the commission members and especially for garment manufacturers.

Respectfully,



Kim M. Shady
North America Sales Manager



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Division of Enforcement

James G. Mills
Attorney

June 26, 1998

Direct Dial
(202 326-3035)

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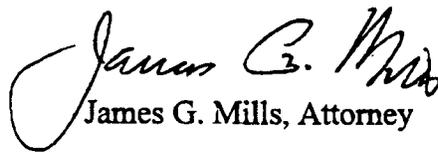
Dear Ms. Shady:

Enclosed is a copy of the Commission's May 8, 1998 notice of proposed rulemaking ("NPR") relating to amendments to the Care Labeling Rule. I am sending it to you with the hope that you will file a written comment on at least the wet cleaning aspects the proposal by (or before) July 27, 1998.

As you can see, section 2 of the NPR, which appears on pages 25419-25422 (with proposed amendment language on page 25426), addresses the "Professionally Wet Clean" instruction. We would particularly appreciate your comments on this aspect of the proposal, and especially the definition of "Professional Wet Cleaning," from your perspective as a manufacturer of professional wet cleaning equipment.

Thank you for your attention to this matter. If you have questions, my telephone number is 202-326-3035 (FAX: 326-3259), and my E-Mail address is "jmills@ftc.gov".

Very truly yours,


James G. Mills, Attorney

decided to employ a modified version of the rulemaking procedures specified in Section 1.13 of the Commission's Rules of Practice. The proceeding will have a single Notice of Proposed Rulemaking, and disputed issues will not be designated.

The Commission will hold a public workshop conference to discuss the issues raised by this NPR. Moreover, if comments in response to this NPR request hearings with cross-examination and rebuttal submissions, as specified in Section 18(c) of the Federal Trade Commission Act, 15 U.S.C. 57a(c), the Commission will also hold such hearings. After the public workshop, the Commission will publish a notice in the *Federal Register* stating whether hearings will be held in this matter, and, if so, the time and place of hearings and instructions for those desiring to present testimony or engage in cross-examination of witnesses.

Part D—Section-By-Section Description of Proposed Amendments

1. Amendments Relating to Required or Permissible Care Instructions

The Commission proposes to amend section 423.1, "Definitions" to include the following definition:

(h) *Professional wet cleaning* means a system of cleaning by means of equipment consisting of a computer-controlled washer and dryer, wet cleaning software, and biodegradable chemicals specifically formulated to safely wet clean wool, silk, rayon, and other natural and man-made fibers. The washer uses a frequency-controlled motor, which allows the computer to control precisely the degree of mechanical action imposed on the garments by the wet cleaning process. The computer also controls time, fluid levels, temperatures, extraction, chemical injection, drum rotation, and extraction parameters. The dryer incorporates a residual moisture (or humidity) control to prevent overdrying of delicate garments. The wet cleaning chemicals are formulated from constituent chemicals on the EPA's public inventory of approved chemicals pursuant to the Toxic Substances Control Act.

The Commission proposes to amend section 423.6(b) of the Rule to read as follows:

(b) Care labels must state what regular care is needed for the ordinary use of the product. In general, labels for textile wearing apparel must have either a washing instruction or a dry cleaning instruction. If an item of textile wearing apparel can be successfully washed and finished by a consumer at home, the

label must provide an instruction for washing. If a washing instruction is not included, or if washing is warned against, the manufacturer or importer must establish a reasonable basis for warning that the item cannot be washed and adequately finished at home, by possessing, prior to sale, evidence of the type described in paragraph (c) of this section. If a washing instruction is included, it must comply with the requirements set forth in paragraph (b)(1) of this section. If a dry cleaning instruction is included, it must comply with the requirements set forth in paragraph (b)(2) of this section. An instruction for professional wet cleaning may also be given. If an instruction for professional wet cleaning is given, it must comply with the requirements set forth in paragraph (b)(3) of this section. If the product cannot be cleaned by any available cleaning method without being harmed, the label must so state. [For example, if a product would be harmed both by washing and by dry cleaning, the label might say, "Do not wash—do not dry clean," or "Cannot be successfully cleaned."] The instructions for washing, dry cleaning, and professional wet cleaning are as follows:

It should be noted that, in addition to the additions to section (b) noted in bold, the following sentence has been deleted: "If either washing or dry cleaning can be used on the product, the label need have only one of these instructions."

The Commission also proposes to add the following subsection to section (b).

(3) Professional wet cleaning. If a professional wet cleaning instruction is included on the label, it must state at least one type of professional wet cleaning equipment that may be used to clean the garment. However, if the product can be successfully cleaned by all commercially available types of professional wet cleaning equipment, the label need not mention any type of wet cleaning equipment. A care label that recommends professional wet cleaning must list the fiber content of the garment and must recommend one other method of cleaning, such as washing or drycleaning, or must warn that the garment cannot be washed or drycleaned if such is the case.

2. Amendment of Reasonable Basis Section

The Commission proposes to amend § 423.6(c)(3) as follows:

(c) A manufacturer or importer must establish a reasonable basis for care information by possessing prior to sale:

(3) Reliable evidence, like that described in paragraph (c)(1) or (2) of

this section, for each component part of the product in conjunction with reliable evidence for the garment as a whole;

3. Amendment of Definitions of Water Temperatures

The Commission proposes to amend the last sentence of § 423.1(d) of the Rule to read as follows:

When no temperature is given, e.g., "warm" or "cold," very hot water up to 145 degrees F (63 C) can be regularly used.

The Commission proposes to amend section 423.6(b)(1)(i) of the Rule to read as follows:

The label must state whether the product should be washed by hand or machine. The label must also state a water temperature—in terms such as cold, warm, hot, or very hot—that may be used. However, if the regular use of very hot water will not harm the product, the label need not mention any water temperature. [For example, "Machine wash" means very hot, hot, warm or cold water can be used.]

The Commission proposes that Appendix A.1.a-1.c be modified to read as follows:

1. Washing. Machine Methods:

a. Machine wash—a process by which soil may be removed from products or specimens through the use of water, detergent, or soap, agitation, and a machine designed for this purpose. When no temperature is given, e.g., "warm" or "cold," very hot water up to 145 degrees F (63 degrees C) can be regularly used.

b. Hot—initial water temperature ranging from 112 to 125 degrees F [45 to 52 degrees C].

c. Warm—initial water temperature ranging from 87 to 111 degrees F [31 to 44 degrees C].

d. Cold—initial water temperature up to 86 degrees F [30 degrees C].

Part E—Regulatory Analysis and Regulatory Flexibility Act Requirements

Under section 22 of the FTC Act, 15 U.S.C. 57b, the Commission must issue a preliminary regulatory analysis for a proceeding to amend a rule only when it (1) estimates that the amendment will have an annual effect on the national economy of \$100,000,000 or more; (2) estimates that the amendment will cause a substantial change in the cost or price of certain categories of goods or services; or (3) otherwise determines that the amendment will have a significant effect upon covered entities or upon consumers. The Commission has preliminarily determined that the proposed amendments to the Rule will not have such effects on the national

■ *A water-based drycleaning alternative*



■ *that's environmentally friendly*

■ *and deep cleans sensitive fibers*



■ *without harsh chemicals . . .*

Introducing affordable wet cleaning from UniMac.

W E T C L E A N I N G

Raytheon Appliances

UniMac

Finally, an affordable and cost

effective system designed

to maximize the real potential

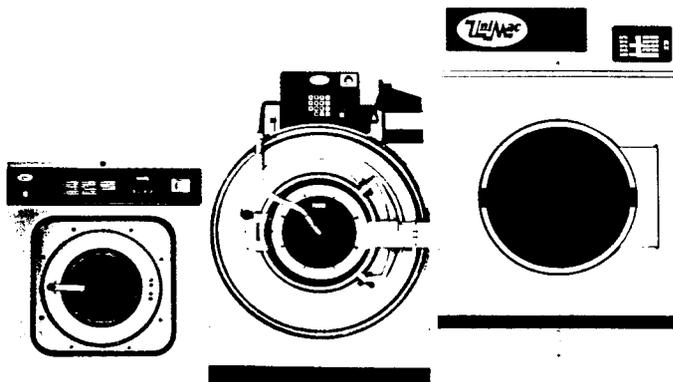
of wet cleaning technology and

revolutionize the professional

fabricare industry.

■ *Technological Advances*

Due to growing environmental concerns, professional fabricare operators are investigating an alternative to traditional dry cleaning, referred to as wet cleaning. It's an environmentally-friendly process that successfully cleans garments without damaging sensitive fibers. In certain garments, wet cleaning has even produced higher quality results than traditional dry cleaning. However, the capital investment has been very high, and even though the process can be applied to an estimated 40 to 50% of garments dropped off at most cleaners, it is difficult for many owners to justify the price. That's why UniMac has introduced an affordable wet cleaning system to supplement existing cleaning methods. UniMac's modular approach is designed to maximize the real potential of wet cleaning in a cost effective way.



Affordable

■ *The Wet Cleaning Process*

The key to successful wet cleaning is the precise management of the process itself through micro-processor controls and variable speed frequency drives. Wash temperature, cylinder speed, mechanical action, cleaning agents, and efficient moisture removal (high speed extraction) each have precise requirements depending on the type of garments being cleaned. Precise control is what makes wet cleaning possible. This requires specialized equipment. Top load washers and hand processing can occasionally produce satisfactory results, but this is very labor intensive and inconsistent. UniMac UW/UF series washer-extractors have been specially designed with the features required for successful wet cleaning, including two wash speeds, seven wash actions, and eight supply signals.

■ *UniMac Versatility*

UniMac wet cleaning products will also operate in normal wash mode, providing unparalleled flexibility, efficiency, and performance for standard day-to-day laundering. This versatility enables owners to offer additional cleaning services to their customers, including hand washables and the growing volume of casual wear.

UniMac's UF18 washer-extractor is especially versatile and affordable for owners with limited space who prefer a lower capital investment. The UF18 is easy to install and offers the same consistent results as the larger models. In addition, the capacity and flexibility of the UF18 will allow an owner to expand his business at a more comfortable rate.

■ *Programming Cycles*

As in normal laundering, the wash cycles are set by detergent supply companies, who tailor formulas to meet individual facility requirements and local conditions. These include water hardness, type of laundry normally cleaned, soil content, and production needs.

UniMac Wet Clean Products include UF and UW Washer-Extractors and a 50-lb. Drying Tumbler.

Environmentally Safe

Washer-Extractor Features

UniMac's washer-extractors* feature the following:

- 39 field programmable cycles
- 3 programmable water levels
- 4 programmable extract options
- Temperature readout
- Temperature-controlled fill
- Overflow rinse
- 5 compartment flush down
- Recirculation system with filter (option)
- 7 programmable wash actions
- 2 programmable wash speeds
- 8 liquid supply signals
- Water reclamation (option)
- Programmable heat (option)
(direct, indirect, steam or electric)

*Some models may vary.

Versatile

UWPV & UFPV Modular Design

UniMac's modular design gives you the flexibility to conveniently add the following modules to your equipment:

Water Reclamation Module

All UniMac UW/UF models have been designed with the capability to operate water reclamation systems that can save 30 to 40% of annual water consumption. This optional module saves rinse water in special tanks so it can be used during the next cycle. This is an important feature, especially in areas where water conservation and utility costs are a growing concern. (Factory or field installed).

Water Recirculation Module

This module features a high volume pump to recirculate solution through the clothes. Lint and unwanted materials are trapped as they pass through a specially designed strainer. This recirculation enhances cleaning action with a gentle agitation of the water and maintains an even temperature throughout the cycle. (Factory or field installed).

Starch Dispenser Module

This microprocessor-controlled module is designed to dispense starch evenly at the programmed time with no employee intervention required after starting the cycle. (Factory installed, UW models only).

Spray Impregnation Module

This module is designed to effectively apply water proofing to garments. The specially formulated chemical is sprayed through a fine mist nozzle located at the top of the door glass. Garments are then tumbled in the cylinder without water for superior results. (Factory or field installed).

Five-Year Limited Warranty

UniMac products are made to last. That's why they're backed by a five year limited warranty on the frame, basket, and shaft; and two-year limited parts warranty issued to the original purchaser on all other parts.*

*Limited warranty: parts only, labor not included. See UniMac Warranty Bond for specifics.

Washer-Extractor Specifications

	Wash Capacity	+Wet Capacity	Cylinder Volume	Free-standing
UF18	18 lbs	10-15 lbs	2.76 cu. ft.	x
UF25	25 lbs	13-20 lbs	4.19 cu. ft.	x
UW35	35 lbs	20-30 lbs	5.8 cu. ft.	
UF35	35 lbs	20-30 lbs	5.79 cu. ft.	x
UW50	50 lbs	25-40 lbs	8.4 cu. ft.	
UF50	50 lbs	25-40 lbs	8.19 cu. ft.	x
UW85	85 lbs	45-75 lbs	14.1 cu. ft.	
UF85	85 lbs	45-75 lbs	14.1 cu. ft.	x
UW125	125 lbs	65-110 lbs	19.2 cu. ft.	
UF135	135 lbs	70-125 lbs	21 cu. ft.	x
UF250	250 lbs	125-220 lbs	39.3 cu. ft.	x

*Wet Clean capacity may vary depending on the type of garments being cleaned.



UniMac's worldwide distributor network is responsible for the marketing, sales, installation, service, and parts for all UniMac products. UniMac distributors have been factory trained to ensure customer satisfaction before and after the sale.

Efficient

UniMac Micro Tumblers

UniMac's microprocessor-controlled tumblers featuring 10 levels of dryness are ideal for the wet clean process. They allow precise control of drying temperature and time so garments aren't overdried. This is critical during the wet clean process. Tumbler cool-down and conditioning are also carefully controlled. All of these elements require specific parameters for wet cleaning to be successful. Since wet cleaning demands consistent heating of garments without hot spots, steam or electric heat drying tumblers provide the best results because they minimize uneven drying.

UniMac tumblers also feature the following options:

Reversing Cylinder

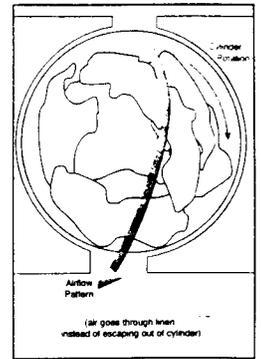
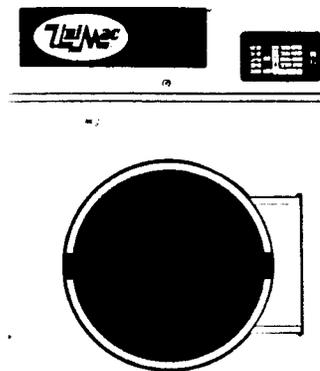
This option helps prevent the tangling of garments during the drying cycle. Tangling can cause uneven drying and longer tumbling times. The reversing cylinder option is recommended for items whose length exceeds the diameter measurement of the cylinder such as wedding gowns, dresses, and pants.

Stainless Steel Cylinder

Not only does stainless steel provide a superior finish and protection to garments tumbling in the cylinder, but it's also easy to clean and maintain. Unlike galvanized steel, stainless steel reduces friction and pilling, and is more gentle on fabrics and beads.

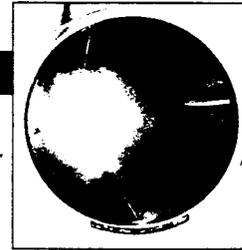
Stainless Steel Panels

Besides the superior finish customers will receive compared to painted panels, stainless steel is easy to clean and maintain. In addition, stainless steel will not chip or corrode, protecting expensive garments. Consequently, stainless steel is recommended for wet cleaning applications.



UniMac's special drying tumbler design pulls air through garments at the precise point where they fall freely to the bottom of the cylinder during the tumbling process. This allows linens to dry quickly and evenly which can shorten overall drying time thereby reducing utility and labor costs.

Superior stainless steel cylinder protects garments.



Belt-Belt Drive

UniMac tumblers feature an all-belt drive system with self-adjusting tension idler, cast iron pulleys, and permanently sealed ball bearings for quiet, low maintenance operation.

Strong Limited Parts Warranty

UniMac offers a two-year limited warranty on the entire drying tumbler including cabinet and parts.*

*Limited warranty; parts only, labor not included. See UniMac Warranty Bond for specifics.

Distributed by:

Raytheon Appliances

UniMac