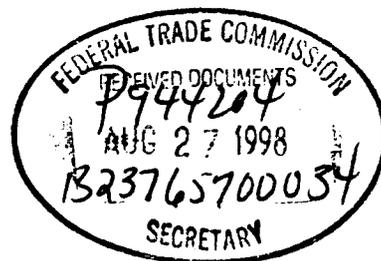


# Procter & Gamble

The Procter & Gamble Company  
Ivorydale Technical Center  
5299 Spring Grove Avenue, Cincinnati, Ohio 45217-1087

ORIGINAL

August 25, 1998



Secretary  
Federal Trade Commission  
Room 159, Sixth and Pennsylvania Avenue, NW  
Washington, DC 20580

**Re: 16 CFR Part 423-Comments, 5/8/98 Advanced Noticed of Proposed Rulemaking**

Dear Sir or Madam:

The Procter & Gamble Company (P&G) appreciates the opportunity to comment on the advance notice of proposed rulemaking to amend its Trade Regulation Rule on Care Labeling of Textile Wearing Apparel and Certain Piece Goods, 16 CFR Part 423 ("the Care Labeling Rule" or "the Rule") published in the Federal Register on May 8, 1998. The Commission proposes amending the Rule: (1) To require that an item can be cleaned by home washing be labeled with instructions for home washing; (2) to allow that a garment that can be professionally wet cleaned be labeled with instructions for professional wet cleaning; (3) to clarify what can constitute a reasonable basis for care instructions; and (4) to change the definitions of cold, warm, and hot water in the Rule.

**Introduction**

The Procter & Gamble Company (P&G), with headquarters in Cincinnati, Ohio, is a leading consumer products company that develops and manufactures many consumer and institutional products including laundry detergents, fabric softeners, laundry stain removers and bleaches.<sup>1</sup> The Company has operations in more than 50 countries and products in more than 140 countries. P&G employs over 95,000 people.

We commend the Federal Trade Commission for the decision to request input and to search for opportunities to improve the effectiveness and efficiency of the Care Labeling Rule. P&G's consumer relations team responds to over 1,000 contacts a month resulting from confusion about garment care labeling. In general, we support this and other FTC efforts to periodically review, request input and consider changes to the Care Labeling Rule to keep current with the changes in consumer habits and garment care technologies.

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<sup>1</sup> Examples of P&G laundry brands include Tide, Cheer, Era, Downy, Bounce and Biz.

## Summary

### Labeling for Home Washing

- P&G supports a proposed amendment to the Rule requiring a home washing instruction for garments for which home washing is appropriate and permit optional dry cleaning instructions for such washable items.

### The “Professionally Wet Clean” Instruction

- P&G supports a proposal to permit manufacturers to include an optional “professionally wet clean” instruction on labels for those items which they have a reasonable basis for a wet cleaning instruction. P&G recommends a “professional wet cleaning” definition that is appropriate yet flexible to changing technology. Our recommended definition is as follows, “professional wet cleaning is the use of aqueous-based solvent, with sophisticated equipment that allows precise control of water temperature, time, mechanical action, chemistry and drying.”

### Home Fabric Care Instruction

- P&G supports a new proposal to permit manufacturers to include an optional “home fabric care” instruction on labels for those items for which they have a reasonable basis to specify a product to be used such as Dryel which can be used to clean garments that cannot be washed at home. Dryel is a new in-dryer “dry clean only” fabric care product which offers the consumer a convenient, safe and inexpensive method for cleaning and freshening garments at home.

### Reasonable Basis Requirement of the Rule

- P&G supports the proposed amendment to clarify that the reasonable basis requirement applies to the garment as a whole. P&G also supports further clarification with a requirement to require reliable test data and use recommended standard test methods from organizations such as AATCC and ASTM.

### Definitions of Water Temperatures

- P&G supports the proposed amendment to make wash temperatures consistent with the AATCC definitions and the addition of a new term “very hot”. P&G supports a consumer education campaign that would help consumers use appropriate and consistent water temperatures to achieve more efficient cleaning (better cleaning at less cost) especially in northern US states with colder water.

**P&G Supports the Requirement to Include Home Washing Instructions When Appropriate**

FTC has proposed to require a home washing instruction for garments for which home washing is appropriate and permit optional dry cleaning instructions for such washable items. P&G supports the proposal and agrees that it will help consumers care for garments in a less costly and more convenient manner.

In question (1), FTC asks “*Is there empirical evidence regarding whether consumers interpret a “dry clean” instruction to mean that a garment cannot be washed?*” P&G has much experience and qualitative evidence to indicate that consumers interpret a “dry clean” instruction or a “dry clean only” instruction to mean that a garment cannot be washed or cared for in the home. We are currently collecting quantitative data on this question and plan to share this data with FTC.

**P&G Supports the Use of an Optional “Professionally Wet Clean” Instruction**

P&G supports the proposal to permit manufacturers to optionally include a “professionally wet clean” instruction for those items which they have a reasonable basis for a wet cleaning instruction. P&G recommends changing the required equipment statement to an optional statement of at least one type of equipment that may be used to clean the garment (unless it can be cleaned by all commercially available types of professional wet cleaning equipment). This specific equipment listing should not be required because the competitive marketplace and the definition of “professional wet cleaning” will promote the development of standard methods and equipment that can be used on the majority of garments. Furthermore, the complexity and diversity of equipment puts a burden on the garment manufacturer to research and label with the latest equipment for both cleaning and finishing. An analogy to dry-cleaning would show that a diversity of dry-cleaning equipment and methods has not necessitated a specific need to call out the brand or type of equipment. Professional judgment along with the fiber content and color of the fabric should allow the cleaner to make the choice of equipment.

P&G recommends a professional wet cleaning definition that is appropriate yet flexible. Our recommended definition is as follows, “professional wet cleaning is the use of aqueous-based solvent, with sophisticated equipment that allows precise control of water temperature, time, mechanical action, chemistry and drying.” Such a definition should allow for changes for a technology that is in its developmental stage yet permit the development of standard test methods. No mention of chemicals used in wet cleaning formulations is necessary because all chemicals manufactured or imported in the United States of America are required to be on EPA’s inventory of approved chemicals pursuant to the Toxic Substances Control Act. Furthermore new proprietary chemical technologies that are approved by EPA do not necessarily appear on the public inventory but can be on a confidential portion of the TSCA inventory to protect them from foreign and domestic competitors.

**P&G Proposes a New Category of Instruction: Home Fabric Care**

P&G supports a new proposal to permit manufacturers to include a “home fabric care” instruction on labels for those items for which they have a reasonable basis to specify a product to be used such as Dryel which can be used to clean garments that cannot be washed at home. This type of care instruction would be optional but would allow the garment manufacturers to specify a type of product that allow consumer to care for their “dry-clean only” garment with an easier, less expensive product at home. Specifically FTC should add the following to section 423.6(b) of the Rule, “An instruction for home fabric care may also be given. If an instruction for home fabric care is given, it must comply with requirements set forth in paragraph (b)(4) of this section.” In addition the following would be added to paragraph (b) (4), “If a home fabric care instruction is included on the label, it must state at least one type of home fabric care product that can be used to clean the garment.”

Dryel is a new in-dryer “dry clean only” fabric care product which offers the consumer a convenient, safe and inexpensive method for cleaning and freshening garments at home. Dryel has been available in the US in test market in Columbus, Ohio since January, 1998. With Dryel, consumers can care for their garments at home in their dryer in about 30 minutes for less than \$1 per garment. All of the cleaning ingredients in Dryel are biodegradable and safe for the environment under conditions of use and foreseeable misuse. See attachments for further information regarding marketing, performance and safety of Dryel (*Attachments 1, 2, and 3*). The Dryel fabric care system is designed for use on “dry clean only” fabrics and hand washable items such as cotton sweaters and other special care garments. We have developed test methods for Dryel performance and garment acceptability and are in the process of sharing these with consumer and industry associations. Analysis of our consumer comments on Dryel show that consumers would benefit from “home fabric” instructions. From our Columbus test market alone, we receive over 40 questions a month related to “Can I use Dryel on this garment?”

**P&G Supports Strengthening of the Reasonable Basis Requirement of the Rule**

P&G supports the proposed amendment to clarify that the reasonable basis requirement applies to the garment as a whole. P&G also supports further clarification with a requirement to have written certification available and encourage reliable test data using recommended standard test methods from organizations such as AATCC and ASTM. In developing criteria, we advise the agency to consider criteria that can be adequately enforced given recent decreases in staffing and resources. The agency should consider other enforcement tools and cooperation with US Customs on a required certification statement for imported goods such as, “This garment is certified to comply with FTC care labeling regulations under 16 CFR Part 423.”

**P&G Supports Changes to the Water Temperature Definitions**

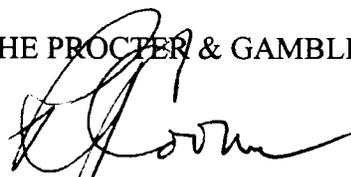
- P&G supports the proposed amendment to make wash temperatures consistent with the AATCC definitions and the addition of a new term “very hot”. Though the term “very hot” will not be understood by many consumers, our qualitative research indicates that if consumers see “very hot” they would be likely to select “hot” on their washer. This will be the best of available choices and therefore this addition of “very hot” will only be a benefit in providing more efficient cleaning for consumers. In addition, the separation of the old hot definition into “very hot” and “hot” categories allows more garments (that may have be harmed at temperatures

above 125 degrees F) to be more efficiently and appropriately washed in hot temperatures less than 125 degrees F. P&G supports a consumer education campaign that would help consumers use appropriate and consistent water temperatures to achieve more efficient cleaning (better cleaning at less cost) especially in northern US states with colder water.

We thank FTC for the opportunity to comment and urge you to carefully consider our comments. Please contact Larry Jacobs at 513-627-6090 if there any questions regarding these comments.

Sincerely,

THE PROCTER & GAMBLE COMPANY



Richard J. Coomes  
Associate Director, Product Safety & Regulatory  
Laundry & Cleaning Products



PRODUCT SAFETY CONTACT: Lawrence D. Jacobs  
Procter & Gamble  
513/627-6090

## *A Breakthrough At-Home Fabric Care System*

### *-Fact Sheet-*

#### *What It Is*

- Dryel is a fabric care breakthrough that helps consumers clean and freshen "dry clean only" clothes in the convenience of their own homes.
- P&G's research has found that:
  - ⇒ Over half of consumers today love the idea of caring for their "dry clean only" clothes at home and use Dryel on a broad range of garments including blazers, sweaters, skirts, dresses and jackets.
  - ⇒ Most consumers view Dryel as a great complement to dry cleaning.

#### *How It Works*

- Dryel's convenient, in-home system delivers fresh clothes in about 30 minutes. Dryel uses a completely different process than dry cleaning and works in four easy steps:
  1. Check garments for any spots or stains. Dryel comes with a specially-formulated cleaning solution to help remove spots and stains as necessary.
  2. Place garments (up to four per load) in Dryel's nylon bag along with a specially-treated pre-moistened cloth and then put into a home dryer.
  3. Tumble in the dryer. Heat from the dryer activates the Dryel cloth, releasing moist fiber-penetrating vapors which help clean away odors such as smoke and perspiration from clothes and vents them out of the bag. The specially-designed bag protects clothes from dryer heat to help prevent problems such as shrinking, stretching and fading.
  4. Hang garments promptly to help wrinkles fall out.

#### *Product Benefits*

- Convenience: With Dryel, consumers can care for their "dry clean only" garments at home.
- Cost: Dryel costs less than \$1.00 per garment.
- Versatility: Dryel can be used on such fabrics as wool, rayon and silk, as well as hand washable items such as cotton sweaters and other special care garments.
- Stain & Odor Removal: Dryel has a unique stain removal system to help remove common stains. Dryel also helps clean away odors like smoke and perspiration from garments and leaves them smelling clothesline fresh.

#### *Using Dryel*

- Dryel can be used on items like:

* sweaters	* blouses	* slacks
* blazers	* dresses	* vests

#### *Pricing/Availability*

- Dryel comes in a primary kit that handles four loads (up to 16 garments). There is also an economical six load Dryel refill.
- P&G does not set retail prices, but expects the product to be priced between \$9.00 and \$10.00.
- Dryel is available in the laundry aisle in food, drug and mass merchant retailers located throughout the Columbus, Ohio area.

 A Fresh Choice For Dry Clean Only Fabric Care



# The Dryel Fabric Care System

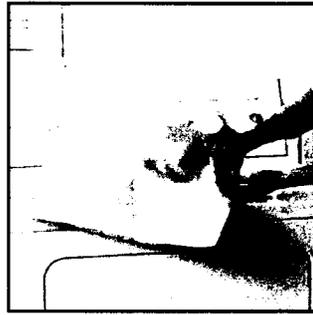
## Stain Removal

1. Check your garments for spots or stains. If a stain is present, place absorbent pad under stained area. With the cleaning solution, use bottle tip and gentle pressure to "erase" any visible stain. Discard pad when finished.



## Preparation For The In-Dryer Process

2. Add one to four garments of similar fiber, weight and color to the Dryel Bag. Open packet, unfold pre-moistened Dryel Cloth and add to Bag. Press closure strips together and place Bag in Dryer. Set dryer on medium to high heat and timed setting for 30 minutes.



## The In-Dryer Process

3. Dryel's heat-activated, fiber-penetrating vapors permeate your clothes leaving them smelling fresh. Vapors gently clean away odors, venting them out of the Bag.



*Dryel's Heat-Activated, Fiber-Penetrating Vapors Help Freshen Clothes and Clean Away Odors.*

## Finishing Touches

4. Hang garments promptly to help wrinkles fall out. Some fabrics or garments may require touch-up ironing. Throw Cloth away after use. Save Dryel Bag for next time. The Dryel Bag is designed to last for up to 20 loads.



**DRYEL**  
**Product Safety Information**

**The Procter & Gamble Company Commitment to Safety**

The men and women of Procter & Gamble are committed to providing products of superior quality and value that improve the lives of the world's consumers. As part of this commitment to make every day better for the world's consumers, we ensure our products, packaging and operations are safe for our employees, consumers and the environment.

**New Products and Technologies**

Before any new product or technology is marketed or used by Procter & Gamble, it must be evaluated and approved by our team of toxicologists, environmental scientists and health professionals. P&G will not market a product unless it is safe for humans and the environment when used as intended and under foreseeable misuse conditions.

**Ingredients**

- The Dryel stain removal solution contains water, biodegradable surfactants and preservatives.
- The Dryel dryer-activated cloth contains water, biodegradable wetting agents, preservatives and perfume on non-woven fiber substrate.
- All ingredients used in the Dryel stain removal solution and dryer-activated cloth are found in other common household products and have a history of safe use in other P&G products.
- The Dryel stain removal solution contains less than 3% volatile organic compounds (VOC's) and the dryer-activated cloth formula contains less than 1% volatile organic compounds (VOC's).

**Human Safety and Child Safety**

- Dryel formulations have a low order of toxicity via all relevant routes of exposure, including ingestion, inhalation, eyes and skin.
- The Dryel stain removal solution is a non-irritant and non-sensitizer as confirmed in clinical studies.
- The Dryel bag has been tested and evaluated for human safety. The bag poses an insignificant risk to children from suffocation and entrapment due to the thickness of the bag material (3 mils) and the incomplete seal design of the bag.

**In-Dryer Safety**

- Laboratory, in-dryer and consumer testing has shown that the bag will not cause or contribute to a fire under conditions of reasonable use and foreseeable misuse.
- Over 5,000 test loads have been run in laboratory dryers with no safety problems.
- Self ignition temperature of the bag is 790°F well above temperatures found in a dryer.
- Normal dryer air temperature is 160-180°F, normal dryer inlet grill temperature is 300-350°F.
- Over 10,000 consumers have used the product over the last 2 years and provided comments through interviews. No safety problems were experienced.
- Dryel has been reviewed and tested by all major U.S. dryer manufacturers.
- Dryel safety information was shared with the Consumer Product Safety Commission and at the International Consumer Product Health and Safety Organization Conference in February, 1998.

**Environmental Safety and Quality**

- All of Dryel's cleaning ingredients are biodegradable and safe for the environment under conditions of reasonable use and foreseeable misuse.
- To reduce solid waste contribution, the Dryel bag is reusable and designed for up to 20 uses.
- The Dryel primary kit's lid made from 100% recycled PET.
- A refill kit was designed to use 49% less packaging than the primary kit and is made from 100% recycled fiber (35% post consumer waste).

For More Information Contact, Larry Jacobs, Procter & Gamble, 513-627-6090 or [jacobs.ld@pg.com](mailto:jacobs.ld@pg.com)