

ORIGINAL

The Woolmark Company
Valley Drive, Ilkley, West Yorkshire
LS29 8PB, England

Tel +44 1943 886240 Fax +44 1943 886292

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THE
WOOLMARK
COMPANY

RJF/ep

26th January 2001

Office of the Secretary
Federal Trade Commission
Room 159
600 Pennsylvania Avenue, N.W.
Washington, D.C.20580
United States of America

Dear Sir

RE: 16 CFR Part 303 – Textile Rule 8 Comment – P948404

As the company owned by and representing the Australian woolgrowers, producers of the finest apparel wool in the world, The Woolmark Company supports creating a new fibre definition for polylactic acid (“PLA”) fibre using the generic name “synterra”.

The combination of Merino wool with PLA fibres offers a wide range of benefits to consumers. Early development trial results are showing that there may be a number of processing efficiency benefits emerging from the natural blend combination. Indications suggest that new levels of performance may be possible in the areas of handle and crease resistance for smart casual products and moisture management advantages for outdoor wear. We feel that PLA meets the criteria for a new FTC category. As stated above, our own testing has demonstrated that PLA does have distinctive physical properties significant to the consumer. Because PLA is derived from natural materials and based on our experience with consumers, we feel that granting a new name such as “synterra” is

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Registered office: Development Centre, Valley Drive, Ilkley, West Yorkshire LS29 8PB, UK

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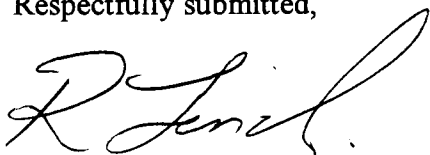


important to the general public. It is important that PLA is clearly identified and delineated from other fibre categories which are derived from petro-chemical sources.

Polyester is understood by consumers to be a purely synthetic material derived ultimately from petro-chemical products. Revising the current definition for polyester to include PLA fibres, or to create a separate category and definition for a naturally derived fibre like PLA within the polyester category, is likely to create consumer confusion and could potentially undermine the appeal and new benefits that PLA brings. Only the third option proposed by the FTC, creating a new separate category in Rule 7 for PLA fibre, satisfies all the FTC's criteria for granting applications for new generic fibre names.

I would like to take this opportunity to thank you for allowing The Woolmark Company to participate in your rulemaking proceeding. Please contact us at +44 1943 886240 if you have questions regarding our support of creating a new category of fibres for PLA.

Respectfully submitted,



Robert Finch
Group Manager
Woolmark Innovation Services