



30 December 2002

Secretary  
Federal Trade Commission  
Room H-159  
600 Pennsylvania Ave. NW  
Washington, DC 20580

**RE: Textile Corporate Leniency Policy**

Dear Sir or Madam:

In response to the solicitation for comments published by Federal Trade Commission (“FTC”) on 2 December 2002 (67 FR 231) on a proposed policy statement describing the Commission’s approach to self-reported minor and inadvertent violations of certain provisions of the rules and regulations implementing the Textile and Wool Acts (the “Acts”), the American Apparel & Footwear Association (“AAFA”) is pleased to submit the following.

AAFA is the national trade association representing apparel, footwear, and other sewn products companies, and their suppliers, which compete in the global market. AAFA's mission is to promote and enhance its members' competitiveness, productivity and profitability in the global market by minimizing regulatory, commercial, political, and trade restraints.

AAFA is pleased that the FTC understands that minor, inadvertent violations of the Acts can happen, despite best efforts to avoid error. AAFA applauds the Commission for its fairness and its outreach towards manufacturers whose mistakes are not deliberate and are not likely to cause harm to consumers. Additionally, AAFA understands that the policy outlined in the solicitation for comments is not a new policy, but simply a reminder to manufacturers that the Commission makes every attempt to be reasonable and just in its enforcement duties.

However, AAFA does have some concerns that a written policy may raise more questions than previously anticipated at first glance. In particular, it is important to note that different-sized

companies operate on drastically different levels (in terms of both production and organization), thus affecting the applicability of the Commission's proposed language.

Therefore, AAFA would like to request a dialogue and exchange of ideas between itself and the Commission on how to best shape formal language that would encourage companies of all sizes to self-report and work with the Commission. If the Commission is willing to agree to such a dialogue, please contact Rachel Subler at 703.797.9039. If the Commission is NOT amenable to entertaining such a dialogue, AAFA requests a 30-day extension of the written comment period in order to further confer with its members on this subject with the goal of submitting more detailed comments. AAFA respectfully notes that the current comment period (December 2-31, 2002) falls within the religious holiday calendar when many AAFA members interested in this topic are inaccessible. Additionally, because the Commission's policy statement already became effective on 2 December 2002, AAFA believes that it is not unreasonable to request such an extension if the Commission does not desire a verbal dialogue with AAFA.

Again, AAFA thanks the Commission for the opportunity to work together to ensure that both American consumers and AAFA's members are treated both fairly and professionally.