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OCT 16 1997

LOG OF TELEPHONE CONVERSATION
OFFICE OF COMPLIANCE

SUBJECT: Flammable Fabrics Act Task Force

DATE OF CALL: September 11, 1997 **TIME:** 10:00 AM EDT

COMMISSION PARTICIPANTS: Patricia Fairall, CRM *PAF*
Marilyn Borsari, CRM

NON-COMMISSION PARTICIPANTS: Myron Meche-Co-Chair-Nat. Ret. Fed
Moe Cain Co-Chair IMRA
Kay Villa ATMI
Ron Pacheco, ITS
Paul Sahutske, Dayton Hudson
Duncan Nixon, AA EI
Catherine Brady, Ross Stores
Julie Hughes, USA-ITA
Karen Grubber, Winston & Strawn

SUMMARY OF TELEPHONE CONVERSATION:

The Flammable Fabrics Act Task Force is developing a program which would help assure that garments sold in the U.S. are in compliance with the Standard for the Flammability of Clothing Textiles 16 CFR 1610.

The call began with a discussion of the August 28 Minutes. Typo and clarification made to one name and affiliation.

We then discussed the ASTM training class. Kay Villa stated that she has spoken with JoAnn Pullen, Chairman of ASTM D-13. ASTM D-13 is currently creating a number of training classes. She mentioned that this class would dovetail nicely with that program and that this group should get involved. CPSC stated that they would try to get the letter out soon, and include importers in the opening paragraph.

The group then discussed the draft guidelines for Reasonable and Representative Testing prepared by Pat Fairall using the guidelines in 16 C.F.R. 1611. Ron Pacheco mentioned that he wants to include a listing of suspect fabrics and suggested that every color be tested. There was some opposition to requiring testing of every color. Some firms state that they try to test different colors on subsequent tests. Ron also suggested that there may be a simpler way to know when further testing should be done such as: any specimen burn time below a specific time should require a retest at specific intervals. Ron stated that he would

incorporate these changes in to a document and provide it for discussion at the next meeting.

Some of the retailers are concerned about the "validity" of the continuing guarantee program. They do not believe that the appropriate testing is being conducted to back up the guarantees. Another retailer mentioned that they are now asking for copies of test results even if they get a guarantee.

CPSC also brought up the idea of a video tape on how to do the testing with clear explanations of some of the raised fiber surface observation terminology. The group thought this was a great idea. CPSC stated they would explore this further.

The next scheduled conference call with the main task group is: Thursday, September 25th at 10:00am EDT.

Distribution:

Office of the Secretary
CPSC Participants