



Division of Enforcement
Bureau of Consumer Protection

March 27, 1998

John F. Sterling

Assistant General Counsel

Corporation

Pillowtex Corp

435 E. Main Street

Dear Mr. Sterling:

This is in reply to your letter of February 13, 1998.

On February 13, 1998, you advised that you are a member of the Committee on the Commission of the Federal Trade Commission, and you are requesting that the Commission issue an advisory opinion on the propriety of your continuing to use the term "100% Cotton" on the labels of your products.

Your question concerns the application of the rules and regulations thereunder. Your question concerns the application of the rules and regulations thereunder.

Specifically, you ask whether this Commission is compelled to issue an advisory opinion on the propriety of your continuing to use the term "100% Cotton" on the labels of your products.

Cotton (ground) constitutes 60% of fabric and pile (40%).

of any advertising makes... course, care must be taken to avoid deception in labeling...
 Moreover, a trademark that implies the... made of the premium cotton, if such is not the case...
 that includes a slightly altered form of the... presence of a premium cotton (such as a trademark...
 or "Egyptian") may trigger the need for additional disclosures to avoid a... words "Pima"
 disclosure that the product is composed solely of the premium cotton, if such is not the case... misleading im-
 by the Commission... Textile Rules. As you may know, the Textile Rules recently were revised...
 to reflect more accurately the requirements pertaining to the labeling of the fabrics...
 the amendments... announcing

to reflect more accurately the requirements pertaining to the labeling of the fabrics...
 As the Commission...
 entered into a consent decree with the Commission...
 07/08/95, U.S.D.C. Central District of California... American Viscose Corp., et al., et al.

Commission with Sentinel 26 and the Commission's...
 Commission or by any individual Commission...
 and, where appropriate, to commence an enforcement...
 action.