



I N T E R F A C E  
R E S E A R C H

ORIGINAL

January 26, 2001

Office Of The Secretary  
Federal Trade Commission  
Room 159  
600 Pennsylvania Avenue, N.W.  
Washington, DC 20580

JAN 26 2001  
484357-#5

Re: 16 CFR Part 303 - Textile Rule 8 Comment - P948404

Dear Sir:

I am the Senior Vice President of Technology for Interface Research Corp., the corporate research arm for Interface, Inc., one of the world's leading providers of products and services for the work place. Interface strongly supports the designation of a new generic fiber definition for Polylactic Acid (PLA) fibers using the new generic name, Synterra. This new designation is important to help identify the fact that, not only is the fiber produced from a renewable resource, but it offers a significant step forward in the development of more sustainable products. Key features of this renewable resource based fiber are that the final products can be disposed of not only by conventional routes such as recycling and incineration, but also can be returned to the earth by composting in geographies where such an infrastructure exists.

Interface is a \$1.2 Billion Corporation which offers flooring solutions to commercial and institutional customers globally through Interface Americas and Interface Europe/Asia Pacific. Through the Interface Fabrics Group, we provide textile products to furniture manufacturers and refurbishers, and to private label fabric marketers. Through Interface Research Corp. and the Interface sponsored, nonprofit Envirosense Consortium, we research, develop and promote new solutions for improved indoor environmental quality, more resource efficient floor coverings and fabrics, and more productive and beneficial interior environments.

We sell our products in more than 100 countries and have manufacturing facilities on four continents. We market carpet tile and tufted woven and nonwoven broadloom, as well as raised/access flooring throughout North and South America, Europe, Asia and Australia. We make most of the commercial panel fabric sold in the world, as well as seating fabric and other specialty textiles. In every part of the globe our brands are among the most recognized and respected names in commercial and institutional interiors.

We are finding there is a paradigm shift from the old industrial revolution. Industrialism developed in a different world from the one in which we currently live. There were fewer people, less material well-being, and plentiful natural petroleum reserves in the old system. What emerged was a highly productive take-make-waste industrial system that assumed infinite



supplies of resources and infinite sinks in which to place our industrial waste. At Interface, we recognize that today just the opposite is true, the rate of material throughput is endangering our prosperity, not enhancing it. We see a concern by consumers throughout the world that the environment is being damaged and changes must be made. Therefore, we have redirected our efforts to become environmentally sustainable, as defined by the Earth summit in Rio de Janeiro, "... An economic state where the demands placed on the environment by people and commerce can be met without reducing the capacity of the environment to provide for future generations."

PLA represents a significant first step in achieving this goal. PLA obtained from a renewable resource, such as corn, and its potential ability to be returned to the earth through natural recycling processes such as composting allow it to fit very well into the natural cycle, where all "waste" is food for another, and meets the requirements for environmental sustainability. PLA also has excellent physical properties and fits well into the requirements of carpet or fabric. In both these application areas, the fiber has been shown to meet most of the durability and appearance requirements. We have done an exhaustive search of the literature as well as studied all of the available natural fibers, and only PLA, which behaves as a synthetic fiber but is derived from a renewable resource, meets the requirements for physical properties, environmental sustainability and processability in our applications.

PLA is very different from either the synthetic or natural polymers. In the mind of the typical consumer, we find that synthetic polymers (e.g., polyester) have the reputation of having a harsh feel and poor breathability. These products may be less expensive than natural materials, but carry a large environmental burden. On the other hand, natural polymers have a small environmental impact but are expensive due to processing problems and have poor durability characteristics. PLA, on the other hand, meets both the physical and environmental requirements, which is showing increasing importance and significance to consumers.

PLA fibers are unique in that they possess the physical properties of a high performance synthetic fiber but can be obtained from renewable resources. Using appropriate technology, PLA fibers can be recycled and where the necessary infrastructure exists, could be composted, returning it back to the Earth, matching the cyclic process of nature.

We understand that petitions for a new generic fiber designation must meet the three criteria outlined by the FTC in the notice. These include:

1. The fiber must have a chemical composition radically different from other fibers, which also results in distinctive physical properties significant to the general public;
2. The fiber is in active commercial use or such use is immediately foreseen; and



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3. The granting of the name must be important to the consuming public at large, not just to a grouping of knowledgeable professionals.

We believe that PLA does meet the criteria for the establishment of a new generic fiber designation. We understand the FTC has proposed three options for recognizing this unique material. The first would be redefining Polyester to include PLA; the second is creating a subcategory under Polyester for PLA fiber; and the third is establishing a new generic fiber designation. We feel that identifying PLA as a Polyester, even in a subcategory, would mislead consumers since Polyester has been known to be a synthetic material with the characteristics previously defined that creates a heavy burden on the environment. Placing a naturally derived fiber such as PLA into even a subcategory of the Polyesters will create confusion in the category. It seems to us that the third option, i.e., creating a new separate category for naturally derived synthetic polymers such as PLA fiber, satisfies all the FTC criteria for granting a new generic fiber name.

We, therefore, strongly support the establishment of a new generic name for PLA and feel the name Synterra would guide the consuming public to understand the usefulness of this new material. This new fiber system is the first in what we hope will be a long line of naturally derived fiber systems.

We certainly appreciate the opportunity to participate in this rulemaking procedure and hope you accept our proposal.

Sincerely,

Raymond A. Berard, Ph.D.  
Sr. Vice President of Technology

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