June 19, 2015

Federal Trade Commission

Office of the Secretary

600 Pennsylvania Avenue NW.

Suite CC–5610 (Annex D)

Washington, DC 20580

Submitted via: https://ftcpublic.commentworks.com/ftc/nicepakconsent/

**Re: Nice-Pak Products – Consent Agreement; File No. 132-3272**

[UTILITY NAME] appreciates the opportunity to comment on the proposed consent agreement between the Federal Trade Commission (FTC) and Nice-Pak Products, Inc. We support the proposed agreement and recommend that it be finalized without change.

[UTILITY SPECIFIC INFORMATION…location, service area populations, any information about the problems caused by wipes, etc. For example, “UTILITY NAME has experienced substantial operational and maintenance problems due to wipes and other products that are flushed into the sewer system. Although many wipes are labeled “flushable,” it is our experience that these wipes do not break down quickly in the sewer, contributing to the clogging of pumps, screens, and other equipment. The frequency of these problems has increased over the past X years.” Provide any examples or information about the frequency of pump cleaning, amount of materials removed, etc. “The costs of dealing with these problems is significant, with the costs borne by our ratepayers.”]

The requirements for substantiating a claim of flushability that are outlined in the proposed agreement are appropriate. Wastewater industry professionals – not just the wipes industry – must be involved in determining if evidence supporting a flushability claim is “competent and reliable.” [UTILITY NAME] believes that these requirements should apply to all wipe manufacturers. We encourage the FTC to investigate other wipes manufacturers that may still be marketing wipes as “flushable” even though they do not meet these requirements. In addition, we encourage the FTC to consider the problems presented by wipes that contain plastic, since plastics in wastewater can reduce the ability of a utility to recover resources and may cause environmental problems.

Thank you for addressing inappropriate claims of flushability for wipes and for considering these comments.

Sincerely,