

Secretary,
Federal Trade Commission,
Room H-159
601 Pennsylvania Ave. NW
Washington, DC 20580
Fax: 202-326-3259

Comments to:
16 CFR Part 460 – Labeling and Advertising of Home Insulation

Spray Polyurethane Foam Alliance (SPFA) of the American Plastics Council offers the following comments for your consideration on the revision of FTC regulation concerning labeling and advertising of insulation products for residential use.

1. SPFA supports the use of ASTM C-1363-97 to replace ASTM C-236 and ASTM C- 976.
2. SPFA supports the use of the ASTM C-518, C177, C-1363 test methods and industry accepted 180 days laboratory conditioned aging for SPF at the thickness intended for use in accordance for common comparison point R-value testing.
3. SPFA advises against the improper use of ASTM C-1303 and S-770 (slicing and scaling) estimating methodology. Supporting data is not available that indicates these R-value estimates accurately predict in-situ aged R-values of SPF products. However, field research of next generation blowing agent SPF systems (funded by EPA and managed by SPFA) is underway that will provide C-518 aged R-value measurements of SPF samples obtained from field applications compared with C-1303 & S-770 R-value estimates of selected samples. This research should give some indication whether the scaling and slicing tests can predict aged R-values of SPF insulation. Many in the SPF industry doubt the scaling and slicing R-value estimates would accurately predict SPF R-values in the field. The test methodology does not take into consideration that SPF is applied in several “lifts” that are surfaced with a denser polymer skin or membrane. This skin also reduces the air infiltration that reduces R-value. Another thermal drift mitigation factor concerns the substrate SPF is applied and the covering used over it in roofing applications.
4. In the event FTC does not allow the use of full thickness measurement of SPF according to test procedures listed in ASTM C-1029, SPFA supports the use of C-1029 test methods and procedures for R-value measurements. The current sample preparation listed in ASTM C-1029 specifies that SPF sample is to be 12” x 12” by 1” thick with no substrate attached. A sample of this type aged 180 days already is artificially aged well beyond the 180 days due to the removal of the high-density skins both top and bottom and the thickness of the sample. This opinion is supported by numerous R-value measurements of samples obtained from aged field applications of CFC and HCFC blown SPF that are consistently higher than or within 10% of the R-value measurements obtained by the current

test method and procedures listed in ASTM C-1029. (Alumbaugh, et al,
Department of the Navy, Port Hueneme, CA; Dupont, Freon study, 1965 –1975,)

I will be happy to discuss our suggestions at your convenience. Please contact me at 703-
253-0660 or e-mail: mason_knowles@plastics.org

Very truly yours,

Mason Knowles
Technical Director.