



*Celebrating 75 Years
of Energy Efficiency*

NAIMA
NORTH AMERICAN INSULATION
MANUFACTURERS ASSOCIATION

VIA E-MAIL

March 23, 2012

Office of the Secretary
Federal Trade Commission
Room H-113 (Annex D)
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

RE: NAIMA's Comments on Proposed Consent Agreement: Gorell Enterprises, Inc. –
File No. 112 3053

Dear Sir or Madam:

The North American Insulation Manufacturers Association (“NAIMA”) appreciates the opportunity to provide comments on the above referenced Federal Trade Commission (“FTC”) Consent Agreement (77 Fed. Reg. 12,584, March 1, 2012) and related proposed settlements. NAIMA is the association for North American manufacturers of fiber glass, rock wool, and slag wool insulation products. NAIMA promotes energy efficiency and energy savings through the use of fiber glass, rock wool, and slag wool insulation products.

NAIMA and its members are interested in these particular FTC Consent Agreements because they address claims of energy savings achieved by energy efficiency products. Specifically, the settlements address the appropriateness of claims that the installation of a certain product will achieve up to or a specified percentage of energy savings. NAIMA’s members routinely make claims of up to ___ percent energy savings from insulation products. In fact, the U.S. Environmental Protection Agency (“EPA”) and the U.S. Department of Energy (“DOE”) use these types of claims. For example, “EPA estimates that homeowners can typically save up to 20 percent of heating and cooling costs (or up to 10 percent of total energy costs) by air sealing their homes and adding insulation in attics, floors over crawl spaces, and accessible basement rim joists.” http://www.energystar.gov/index.cfm?c=home_sealing.hm_improvement_methodology. Thus, the “up to” energy savings claims of the EPA, DOE, and NAIMA members are all supported by substantiation in the form of competent and reliable scientific evidence.

Indeed, the foundation of many FTC Guidelines and Rules is the need for credible substantiation. Substantiation protects the consumer. NAIMA submits these comments in support of the FTC’s reaffirmation of the value and importance of substantiation of energy savings claims in advertising and marketing. Any other standard of conduct would be unfair to those who invest time and resources into obtaining substantiating evidence and research.

Sincerely,

Angus E. Crane
Executive Vice President, General Counsel