

February 8, 2018

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue NW
Suite CC-5610 (Annex E)
Washington, DC
20580

XPSA Comments to 16 CFR Part 460 – R-value Rule Review, File No. R811001

The Extruded Polystyrene Foam Association (XPSA), which is a trade association representing manufacturers of extruded polystyrene foam (XPS) insulation products and the industry’s raw material suppliers, welcomes the opportunity to provide these comments on Federal Trade Commission’s 16 CFR Part 460 - Labeling and Advertising of Home Insulation: Trade Regulation Rule.

XPSA regular members (The Dow Chemical Company, Owens Corning, Kingspan Insulation, and Soprema Group) collectively manufacture more than 95 percent of all XPS destined for use in the North American market. XPSA promotes the benefits that accrue to society from appropriate use of XPS foam insulation applications.

XPSA provides these specific comments on certain sections of the proposed rule:

Page 14, last paragraph: It (the Commission) proposes to amend the Rule to apply the testing requirements to R-value claims made for any product marketed to reduce energy use by slowing heat flow in residential buildings. And on page 15: it (the Rule) would simply require that any voluntary R-value claim made in advertising for a non-insulation product be based on appropriate tests referenced in Section 460.5 of the Rule

XPSA supports of this revision to the Rule as necessary to address deceptive and unfair practices. Products that claim energy savings or insulating performance qualities (such as R-value) should base those claims only on technically substantiated testing.

Page 16, last paragraph: the Commission proposes to amend the Rule to clarify that products marketed for residential applications are subject to the Rule’s requirement.

XPSA agrees with the Commission’s proposal. If a product is used in a residential application, the Rule should apply.

Page 20, last paragraph: The statement “NAIMA, which represents both fiberglass and foam manufacturers,”

This statement is inaccurate. While it is true that at least one NAIMA member manufactures both fiberglass insulation and foam insulation, NAIMA does not represent foam insulation manufacturers. NAIMA’s representation is limited to fiberglass insulation and mineral wool insulation manufacturers: <https://insulationinstitute.org/about-naima/>



750 National Press Building
529 14th Street, NW
Washington, DC 20045
Phone: (202) 591-2466
Fax: (202) 591-2445
Website: www.xpsa.com

Page 31: The Commission invites further comments . . . including the criticisms raised about ASTM C1303 and CAN/ULC S770 . . .

XPSA agrees with the criticisms raised regarding ASTM C1303 and CAN/ULC S770. XPSA's concerns with these two standards were included in XPSA's comments to the ANPR – there's no need to reiterate here.

Page 31: The Commission invites further comments . . . the identity and reliability of any tests (other than ASTM C1303 and CAN/ULC S770) currently used by various manufacturers to comply with the Rule's aging requirement, . . .

XPSA is not aware of any other test method or standard which artificially attempts to create a aging cycle to predict future performance of insulation products with captive blowing agents.

Page 35: The Commission seeks further comment . . .

XPSA supports the Commission's conclusion to maintain the 75°F mean temperature requirement.

Thank you for the opportunity to submit these comments. Please contact me with any questions or comments.

Sincerely,

John Woestman

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Codes and Standards Director
529 14th Street NW, Suite 750
Washington, DC 20045
jwoestman@kellencompany.com
515-422-6027