

Comments on the Federal Trade Commission's Notice of Proposed Rulemaking —  
**16 CFR Part 460: Labeling and Advertising of Home Insulation: Trade Regulation Rule;  
Proposed Rule (Jan.22 2018)**

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I greatly appreciate the opportunity to participate in the rulemaking process to submit comments to the Federal Trade Commission's (FTC) Notice of Proposed Rulemaking on *Labeling and Advertising of Home Insulation* (R-Value Rule).

I strongly support the update for the R-Value Rule, because the rule helps to conduct healthy operations in the home insulation market, benefiting both consumers and producers.

First, the rule enables customers to evaluate the operation and performance of contending home insulation products in the market. Consumers, unlike producers or professionals who have the expertise in the field of home insulation, do not know which insulation product works the best in their houses. Hence it is possible that when making their decisions, consumers blindly follow suggestions from home insulation producers and manufacturers. In many cases, companies provide customers with misleading ideas of how well the product can perform and thus to maximize their profits. Nevertheless by introducing the R-Value Rule, producers are obliged to show customers a fact sheet which introducing the concept of R-Value. The claim shown on the fact sheet, such as "The higher the R-Value, the greater the insulating power," helps costumers to stay away from misleading advertisement among manufactures. Furthermore, without the R-Value Rule, producers are able to put out ambiguous claims on energy saving on their products. In previous comment, the North American Insulation Manufactures Association (NAIMA) provides an example that without the "saving vary" discloser, some manufactures claims their saving of energy was 50%, which is totally misleading. Now with the R-Value Rule, producers need to make their advertising language more accurate and avoid misleading. Hence the R-Value Rule enables FTC to act as a protector against false and misleading advertisement claims and protect the rights of consumers. Furthermore, the R-Value Rule ensures future fair competitions in home insulation market, because it provides a standard for producers to conduct self-supervision among each other. Additionally by providing consensus testing standard given

by America Society of Testing and Materials (ASTM), the rule provides a fair standard and instruction for producers. FTC also promises to keep the R-Value test standard up to date in order to provide the most accurate R-Value for producers and consumers.

Despite all the benefits the rule provides, here raise my concerns: how long is the R-Value valid for after taking the test provided by ASTM? Because the air and humidity can affective accuracy of the R-Value, the valid period of the test should under identification. For example, some insulation materials may have been sitting in the storehouses for a period of time and the R-Value reflected on the product label may not be an accurate one. Hence I suggest that the test be done on a scientifically timely manner to maintain accuracy. Moreover, I suggest that space-constrained ads should not be exempt from requiring energy saving claims discloser in order to help consumers make the right choice in a broader sense.

In sum, the reauthorization of R-Value Rule is essential for both consumers and producers in the home insulation market. Knowing the R-Value Rule, consumers are able to make decisions to save money and use energy efficiently. On the other hand, FTC ensures fair competition in home insulation market by implementing the R-Value Rule.