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March 23, 2018

Federal Trade Commission
Office of the Secretary
Constitution Center
400 7th Street SW
5th Floor, Suite 5610 (Annex B)
Washington, D.C. 20580

Re: 16 CFR Part 460 – R-value Rule Review, File R811001

Dear Secretary,

I am writing in response to the Federal Trade Commission request for public comments on 16 CFR Part 460: Labeling and Advertising of Home Insulation (The “Rule”) as published Monday January 22, 2018 in the Federal Register.

AFM Corporation represents the interest of 19 expanded polystyrene (EPS) rigid board insulation manufacturing facilities. We have extensive experience with publishing the R-value of our insulation to both home users and commercial markets. In addition, we operate an ISO17025 accredited testing laboratory which regularly conducts R-value testing in accordance with the Rule.

We appreciate the opportunity to supply comments on the proposed rule.

Commercial Insulation

Although the Commission did not expand the rule to commercial insulation as suggested in our prior comments, we fully support the proposed 460.2 which clarifies the requirements for commercial or industrial insulation used in residential buildings.

ASTM International

The proposed 460.5 makes a reference to “American Society of Testing and Materials (ASTM)”. The American Society of Testing and Materials changed their name to “ASTM International” in 2001. We recommend the reference be updated accordingly. In addition, this section stated the test methods are “designed” by ASTM. It would more appropriate to update this to “developed” following the language used by ASTM International.

Reference: https://www.astm.org/ABOUT/full_overview.html

Aging of Cellular Plastic



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The proposed 460.5(a)(1) recognizes R-value tests for polyurethane, polyisocyanurate, and extruded polystyrene must be done on samples that “fully reflect the effect of aging on the product’s R-value”. Although the Commission did not adopt ASTM C1303 as suggested in our prior comments, we fully support the revised section which as proposed concisely requires manufactures to determine the full effect of aging on their R-values. This is an important protection for consumers.

Final Comments

We appreciate the opportunity to provide comments during the commissions review of the R-value rule and are supporting of the proposed rule with minor adjustments as noted above.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Bergstrom".

Todd Bergstrom, Ph.D.
COO