

“16 CFR Part 460 – R-value Rule Review, File No. R811001”

A.(1) *Need*: YES! There is ABSOLUTELY a need for this Rule. I’m a consumer who just got ripped off by a spray foam insulator who didn’t disclose R-Value. It’s almost ‘the only leg I have to stand on’ because he thinks he didn’t need to follow PA building code b/c it’s an old house.

A.(2) *Benefits*: This Rule helps Keep Consumers INFORMED !!

Costs: I can’t see that this has imposed costs upon the consumer. Aside from, obviously, the cost of taxpayer dollars affording an FTC.

A.(3) -- Not applicable to me

A.(4) *Recommended Changes*: **Part 460.15: How Installers must handle Fact Sheets** -- This Rule needs to say that Sellers must ‘GIVE’ Buyers a Fact Sheet -- NOT just ‘SHOW’ the buyer.

If we are working with a swindler, then he will just say “I showed them.” -- The Buyer should have to SIGN OFF upon the Fact Sheet. Signatures -- Buyer has seen, AND Buyer is aware of what R-Value should go in the ceiling or in the walls, according to Building Code.

Affect of the Cost to Consumer : We are talking about the price of a piece of paper. Not significant for buyer OR seller.

A.(5) *Impact on Information*: This Rule can only benefit TRUTH. If buyer has to sign off, then Deception is firmly minimized. But, as I was told, (after the fact, after being ‘ripped off’) -- “If you’re dealing with a Thief, he WILL steal from you.”

We were dealing with Noncomplying contractor. Those contractors are still out there, not working to this law. Can’t FTC send copies of the R-Value Rule to all insulation contractors?

A.(6) *Compliance*: We dealt with a contractor who ignored this rule, and did not tell us the R-Value we were receiving. Part 460.17 — What installers must tell their customers — The rule wording needs to be modified to say “R-Value must be shown on estimate”.

A.(7) no comment

A.(8) *Additional Unfair or deceptive Practices*: No real ‘proof’ here, just my word ... We were told by the spray foam insulating contractor that we were buying “The Best”. So we believed him. Turns out that 5-1/2 inches of “the Best” is only One Half the recommended R-Value as per Building Code. (We got R15, in a ceiling where R38 is code). Deceptive, to say the least ... on an item that can’t be removed without great money and effort.

A.(11) *Conflicts with other requirements*: Because ours is an older home, in the state of PA, they do not have to get a permit before beginning insulation work, therefore, no one is watching to see what the contractor does. The HOMEOWNER *must know* the Building Code and this R-Value Rule. How to get the information to the homeowner would be a question...with older folks who may not be ‘online’.

(11). “*Are there any Rule changes necessary to help state law enforcement agencies combat deceptive practices in the insulation market?*” — In the state of PA, Insulation Contractors should be given copies of The R-Value Rule so that they will be obligated to comply, just as when they receive the laws for being a Home Improvement Contractor.