



INSULATION CONTRACTORS ASSOCIATION OF AMERICA

1321 Duke Street, Suite 303
Alexandria, Virginia 22314

Tel: 703.739.0356
Fax: 703.739.0412

Website: www.insulate.org
Email: icaa@insulate.org

August 30, 2016

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

Re: 16 CFR Part 460 - R-value Rule Review, File No. R811001

Dear Secretary:

ICAA is a membership organization representing residential and commercial thermal insulation contractors who install all types of building insulation. It is ICAA's position that the R-value Rule has been effective in its purpose to protect consumers of insulation. ICAA believes that there is a continuing need for the R-value Rule as there is no other facility to ensure that consumers receive relevant information for pre-purchase decisions. ICAA does not see any significant costs of compliance imposed by the Rule.

The Commission may wish to consider amending the R-value Rule to include thermal insulation sold for use in commercial buildings, as commercial building energy use represents 19% of all U.S. energy consumption.¹ Also, newer technologies may require the adoption of industry-recognized energy efficiency ratings.

Thank you for the opportunity to express our views on this matter.

Sincerely,

Michael Kwart
Executive Director

¹ Buildings Energy Data Book, U.S. Department of Energy, Building Sector Energy Consumption, Table 1.1