



# Cellulose Insulation Manufacturers Association

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September 18, 2003

Office of the Secretary  
Federal Trade Commission  
600 Pennsylvania Ave., N.W., Room H-159  
Washington, D.C. 20580



Re: 16 CFR Part 460—"Labeling and Advertising of Home Insulation"

In response to the Commission's request for comments on proposed changes to 16 CFR Part 460 ("The R-Value Rule") as published in *Federal Register*, Tuesday, July 15, 2003, the cellulose insulation manufacturers association submits the following answers to the specific questions posed by the Commission.

*Should the Commission amend section 460.5(a)(1) of the Rule to require the use of ASTM C 1303-95 for homogeneous, unfaced, rigid closed cell polyurethane, polyisocyanurate, and extruded polystyrene insulations?*

CIMA abstains from comment on this matter.

*Should the Commission require the use of ASTM C 1149 for determining the settled density of self-supported, spray applied cellulose insulation?*

This is the appropriate material standard for this type of insulation, and CIMA endorses its addition to the Rule. The term "settled density" does not apply to this type of material and should be changed to "density."

*Should the Commission amend sections 460.12(a)(2) and (3) to require the same coverage charts for all types of loose-fill insulation at R-values of 11, 13, 19, 22, 24, 32, and 40?*

The required R-values differ from those that have traditionally been given for cellulose insulation and are specified in ASTM C-739. Some cellulose insulation manufacturers would have to develop new coverage charts to comply with this change. The ASTM standard should also be amended to reflect the new R-values. There are costs associated with development of new coverage charts, but if given a reasonable amount of time for manufacturers to comply this change would provide a helpful coordination of "standard" R-values for the insulation industry.

*Should the Commission amend the testing and labeling provisions of the Rule to require the use of ASTM C-1374 for determining the initial installed thickness of loose-fill insulation?*

CIMA endorses ASTM C-1374 as an effective test method for determining initial installed thickness of all types of loose-fill insulation, and supports its incorporation in the Rule.

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*Are there additional changes to the Rule that have not been addressed that would help to ensure that installers apply the proper amount of insulation, particularly loose-fill?*

CIMA joins NAIMA in recommending that the Rule require installers to affix attic cards in easily visible locations.

CIMA restates a recommendation made in previous comments to the Commission that the Rule address the matter of loss of R-value at low attic temperatures by specifically acknowledging the existence of this phenomenon and requiring manufacturers to provide cold weather design information for their products. An ASTM test method, C-1373 "Standard Practice for Determination of Thermal Resistance of Attic Insulation Systems Under Simulated Winter Conditions," exists for assessing the effect of cold weather on actual installed R-value. There is no reason for the commission to ignore this property of some low density fiber insulation materials. The State of Minnesota already provides its residents with this important consumer protection by requiring insulation manufacturers to provide cold weather design information for their products.

The proposed rule changes do not incorporate ASTM C-1497, the standard for stabilized cellulose insulation, although the rule specifically mentions stabilized cellulose. This material standard should be referenced for test methods for the properties of stabilized cellulose insulation.

CIMA wishes to comment on a proposed addition to 460.12[2]. The statement: "You must also provide the appropriate blowing machine settings necessary to achieve the initial installed thicknesses listed on your label" is ambiguous to the extent that a manufacturer would have no idea of how to comply. There are undoubtedly more than a hundred different makes and models of blowing machines in use by contractors. Beyond this, the actual performance of machines changes somewhat with age and use of machines. Can a manufacturer comply with this requirement by selecting one blowing machine it deems to be "representative" and publish settings that specifically reference that machine? If not, how many sets of machine settings must be provided on the label to conform with this provision of the Rule? A requirement that a manufacturer must provide settings for a large number of machines would represent a significant financial burden to smaller manufacturers. In the absence of clarification of specific requirements for conformance CIMA must state its opposition to this addition to the Rule.

Respectfully submitted  
Cellulose Insulation Manufacturers Association



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