

529 °C' Street S.W. Auburn, Wa 98002 192 Limmer Road Winlock, Wa 98596

425/644-3532 • 253/939-0992 • 360/785-9190 • Fax: 253/939-5653



RF11001

P 322 778 611

19 September 1999

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

Re:

16 CFR Part 460

Trade Regulation Rule

Sir,

I request the following change to above rule as follow:

Delete 460.8 out of this rule, either the manufacture make the material to the correct label R value and has tested the material correctly or the consumer is totally mislead.

Thank/Xou,



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SECRETARY

R811001

19 September 1999

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

Cortyal P222 778 6/2

Re:

16 CFR Part 460

Trade Regulation Rule

Sir,

I request the following change to above rule as follow:

FTC to require all manufactures that compress mass type of insulations to test materials for R-values after packaging.

Test shows that R-Values can be reduces by over 20% thereby saving shipping cost compared to other manufactures.

Thank You

Adrian D. Troutman



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19 September 1999

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

P 202 778 609.

Re:

16 CFR Part 460

Trade Regulation Rule

Sir,

I request the following change to above rule as follow:

FTC to require all manufactures to provide not only there Test Report, but also a Copy of the ASTM Test so as a consumer can review to determine any errors based on label.

I was surprised to find the heating side on ASTM C518 on top, what else in this test that can be question I do not know unless someone tell where I can get a copy of there test.

Thank You,



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19 September 1999

P222 778 606

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

Re:

16 CFR Part 460

Trade Regulation Rule

Sir,

I request the following change to above rule as follow:

Delete 460.8 out of this rule or delete 16 CFR 460 Rule this totally mislead the consumer in cost saving especially if there is error to be found in testing materials. And who can tell a manufacture on how to test his material correctly. I know once, I test Owens Corning Fiberglass, I hav'nt got there brand.

Thank You



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19 September 1999

P 202 778 598

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

Re:

16 CFR Part 460

Trade Regulation Rule

Sir,

I request the following change to above rule as follow:

FTC must have an agency to handle complaints if ASTM Tests are not equal or error found in Test of insulation material.

If ASTM C518 is only for heat flow down and ASTM C236 has an error of 10 % between Testing Laboratories not including Testing Laboratories that were not included so a Company simply has his material tested at all Laboratories and uses the best test.



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Pa22 778 600

19 September 1999

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

Re:

16 CFR Part 460

Trade Regulation Rule

Sir,

I request the following change to above rule as follow:

Require all manufactures to clearly state on labels FTC 460.8 that there material can be 10 % below the label value, not including packaging and exact test being used with direction of heat for Summer or Winter use.

Thank You



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19 September 1999

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

P222 778 599

Re:

16 CFR Part 460

Trade Regulation Rule

Sir,

I request the following change to above rule as follow:

Require ASTM not be reference in any form unless anyone or any manufacture be allowed on any committee and equal rights to vote and correct any ASTM Test found in error.

My materials cannot be used on government projects because no one else manufactures my products, therefore no one else tests except ASTM in this area.

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192 Limmer Road Winlock, Wa 98596

19 September 1999

P222 778607

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

Re:

16 CFR Part 460

Trade Regulation Rule

Sir,

I request the following change to above rule as follow:

FTC to simply change FTC 460 to require all insulation materials to be test with the cold side at 25 degrees and Heated side at 75 degrees in a manner common to manufacture installation including any structure members, clearly stating Heat flow Up or Down or Sideway.

Thank You,



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19 September 1999

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

P 202 TI & 597

Re:

16 CFR Part 460

Trade Regulation Rule

Sir,

I request the following change to above rule as follow:

FTC to require all labels to advertise any loss of insulation values if place between structural members, such as 7 % loss if place between wood studs so as consumer can determine the correct cost of material and savings on heating of home.

Thank You,

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19 September 1999

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

P 222 778 608

Re:

16 CFR Part 460

Trade Regulation Rule

Sir,

I request the following change to above rule as follow:

FTC to require all labels for Reflective Insulation to clearly state all layers must be enclosed and no gaps so as see plywood or OSB BOARD at ends after installation.

Recommend installing a light above material and any light coming out will determine if the Reflective Material is meeting Label Value.

Thank You