

November 12, 1999



Kent C. Howerton, Attorney  
Federal Trade Commission  
Room 159, 600 Pennsylvania Ave., N.W.  
Washington, D.C. 20580

Re: Comments Regarding 16CFR Part 460

Dear Kent,

Its me again. Sorry I'm late with this. I only have a few minor comments and suggestions as follows:

1. The issue of dust on foil is very real in a laid down attic application and will noticeably reduce its emittance. However, that has not proven to be an issue on foil facing downward in a building or attic. I personally saw results from emittance tests on single sheet foil installed in commercial buildings over 20 years and it still had a emittance in the .05 range. I've also seen foil from an attic, facing upwards, that was over 20 years old and it had an emittance of .80+. Not very good.
2. The testing you refer to, for testing both the reflective insulation and the framing assembly has changed. The new test method is "C1363 Test Method for the Thermal Performance of Building Assemblies by Means of a Hot Box Apparatus". This test will replace the C236, C976, C177 and C518 mentioned currently in C1224.
3. You appear to already have the new emittance test which is C1371 instead of E408.

I did not see anything else that was of concern. Your proposal changes seem to address everyone's concerns and the test data, such as mean temperatures and temperature differential, is the same as in C1224. If you have any questions please call.

Respectfully,

Roy N. Akers  
ASTM TG Chairman C1224-98