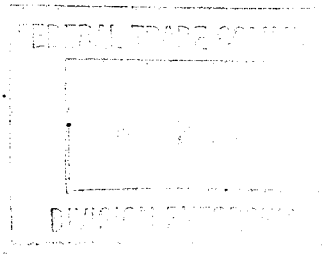
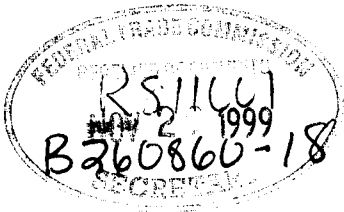




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Kent Howerton, ATTY
Federal Trade Commission
601 Pennsylvania Ave. NW
Washington, DC 20580

Dear Mr. Howerton:

Spray Polyurethane Foam Alliance (SPFA) of the American Plastics Council offers the following comments for your consideration on the revision of FTC regulation concerning labeling and advertising of insulation products for residential use.

1. SPFA supports the full product thickness testing at industry accepted 180 days laboratory conditioned aging for common comparison point R-value testing. It is our understanding that supporting data on the full thickness R-value benefit of SPF has been supplied to you by ConsultMORT Inc
2. SPFA advises against the improper use of ASTM C-1303 (slicing and scaling) estimating methodology. This test methodology does not take into consideration that thicker foam specimens are protected from outside air infiltration and maintains a higher aged R-value. It also does not recognize that SPF is applied in several "lifts" that are surfaced with a denser polymer skin or membrane. This skin also reduces the air infiltration that reduces R-value. Another thermal drift mitigation factor concerns the substrate SPF is applied and the covering used over it in roofing applications.
3. In the case of non-homogenous layered materials such as SPF, the use of k factor-derived calculations are by definition improper, since the terms "conductivity" (k factor) and "resistivity" (r-factor) relate to a unit thickness of a homogenous material. As an example, multilayered (non-homogenous) roof systems, are characterized by surface-to-surface R-values as a best representation of real field conditions.
4. SPFA supports including commercial insulation in the regulation.

I will be happy to discuss our suggestions at your convenience. Please contact me at 703-253-0660 or e-mail: mason_knowles@plastics.org

Very truly yours,

Mason Knowles
Technical Director.