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Reflective Insulation Manufacturers Association
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To: Mr. Matt Lewis, Federal Trade Commission
From: Bill Lippy, Reflective Insulation Manufacturers Association
Date: November 15, 1999
CC: Mary Edmondson, RIMA Executive Director

The following are in response to published comments in the Federal Trade Commission document 16 CFR Part 460, Trade Regulation Rule: Labeling and Advertising of Home Insulation; Proposed Rule dated September 1, 1999.

Page 48031, Section b. Reflective Insulations Topic: Aging

CORROSION

Aluminum foil naturally oxidizes which provides protection against corrosion in typical building application thus emittance, and thermal performance, is not sacrificed. Furthermore, ASTM C1224, Standard Specification for Reflective Insulation requires the product be tested for Corrosion.

DUST

By definition (see ASTM 1224) Reflective Insulation products are installed in closed cell cavities regardless of the orientation of the material, thus preventing or minimizing concerns of dust accumulation.

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Radiant Barriers

ASTM C1340-96 (computer program) is recognized by RIMA as a valuable tool and is a good starting point for a comprehensive methodology to calculate savings when using radiant barriers; however, the program to date does not take into account air conditioning ducts that are located in the attic space. A/C ducts are commonly placed in attic spaces in the Sunbelt, which accounts for the greatest residential air conditioning use in the United States. The Florida Solar Energy Center (FSEC) and the University of Nevada Las Vegas (UNLV) have determined that the AC ducts can be significant in terms of heat gain and overall savings and that radiant barriers can significantly influence savings in this area. While ASTM C1340-96 offers an important tool, it is necessary that other programs, which are more comprehensive in savings determinations, be considered.

OTHER

Include Interior Radiation Control Coatings (see ASTM C1321-98) as a category in the FTC listing.