

BaySystems encourages insulation contractors, consumers and builders to become familiar with the FTC requirements regarding home insulation.

The Federal Trade Commission's (FTC) revisions to the Home Insulation Rule are designed to protect consumers from misleading, unfair or deceptive acts or practices. With increased energy costs and available Federal tax credits, consumers are turning to insulation more than ever to improve their homes' energy efficiency.

Responsibility of the Manufacturer

To comply with the FTC Labeling and Advertising of Home Insulation Rule and ENERGY STAR product certification requirements, BaySystems foam insulation products are tested at an independent test facility utilizing ASTM C 518 "Standard Test Method for Steady-State Heat Flux Measurement and Thermal Transmission Properties by Means of the Heat Flow Meter Apparatus."

16 CFR Part 460-Labeling and Advertising of Home-Insulation: Trade Regulation Rule; Final Rule

II. Overview Of The Rule-31258

D. Requirements of the Rule

The Rule requires that manufacturers and others who sell home insulation determine and disclose each product's R-value and related information (e.g., thickness, coverage area per package) on package labels and manufacturers' fact sheets. R-value ratings vary among different types and forms of home insulation and among products of the same type and form.

To ensure that R-value claims take these factors into account, the Rule mandates that the required R-Value tests for **polyurethane**, polyisocyanurate, and extruded polystyrene insulation products be conducted on test specimens that fully reflect the effect of **aging**, and for loosefill insulation products on test specimens that fully reflect the effect of settling.

Energy Star Requirement to Become a qualified insulation product:

1. Provide the documents and background information on R-value lab test results (as required by U.S. FTC "home insulation" regulations (16 CFR Part 460).
2. Consumer materials explaining what the product is, what it does, and documentation of claimed energy saving benefits.
3. Clear instructions for proper installation of the product to get the benefits promoted by the manufacturer.

Polyurethanes are manufactured in a process that results in a gas other than normal air being incorporated into voids in the products. This gas gives the product an initial R-value that is higher than it would have if the product contained normal air. The aging process causes the R-value of these insulation materials to minimally decrease over time due to cell gas exchange with atmospheric gasses.

The Bayseal product technical datasheets reflect the aged R-value of the material. Additional copies of the product technical datasheets can be found on the baysystemsspray.com website.

Responsibility of the Installer

To help Bayseal installers comply with section 460.17 of the FTC Rule, BaySystems has drafted a Bay-

seal Insulation Certificate. The certificate can be given to customers by installers as a receipt to identify the coverage area, thickness, and R-value of the installed insulation. A copy of the new Bayseal Insulation Certificate is attached for review.

16 CFR Part 460-Labeling and Advertising of Home-Insulation: Trade Regulation Rule; Final Rule

§ 460.17 What installers must tell their customers-31275

If you are an installer, you must give your customers a contract or receipt for the insulation you install. For all insulation except loose-fill and aluminum foil, the receipt must show the coverage area, thickness, and R-Value of the insulation you installed. The receipt must be dated and signed by the installer. To figure out the R-value of the insulation, use the data that the manufacturer gives you. If you put insulation in more than one part of the house, put the data for each part on the receipt. You can do this on one receipt, as long as you do not add up the coverage areas or R-values for different parts of the house. Do not multiply the R-value for one inch by the number of inches you installed. For loose-fill, the receipt must show the coverage area, initial installed thickness, minimum settled thickness, R-value, and the number of bags used. For aluminum foil, the receipt must show the number and thickness of the air spaces, the direction of heat flow, and the R-value.

In addition to the FTC Rule, the ICC IRC requires R-Value markers be affixed to the trusses and joists throughout the attic space.

ICC IRC 2006

N1101.4.1 Blown or sprayed roof/ceiling insulation. The thickness of blown in or sprayed roof/ceiling insulation shall be written in inches (mm) on markers that are installed at least one for every 300 ft² (28 m²) throughout the attic space. The markers shall be affixed to the trusses or joists and marked with the minimum initial installed thickness with numbers a minimum of 1 inch (25 mm) high. Each marker shall face the attic access opening. Spray polyurethane foam thickness and installed R-value shall be listed on the certificate provided by the insulation installer.

Industry Support

Reducing air leaks and properly installing insulation are key elements to having a high-performance envelope that provides an energy-efficient and comfortable home. At BaySystems we take product testing, code compliance, applicator training and accurate reporting of our products capabilities very seriously. We ask that our industry partners verify that "aged" R-Value instead of "initial" R-value is reported on product datasheets and that the technical document package (tech datasheets, MSDS, specification) reflect a single product name.

Home buyers-your insulation package is such an important part of the performance of your home. You have a right to know what type of material is installed, what the aged R-value is of that material and the name of the contractor that installed the product. Request a copy of the insulation certificate for your files.

The Federal Trade Commission 16 CFR Part 460 Labeling and Advertising of Home Insulation: Trade Regulation Rule can be viewed by clicking on the following link: [FTC Home Insulation Rule](#).