

CODE OF FEDERAL REGULATIONS
Title 16, Part 460
Labeling and Advertising of Home Insulation

**WHAT DOES THE FEDERAL TRADE COMMISSION SAY ABOUT REFLECTIVE
R-VALUES ?**

The Federal Trade Commission (FTC) enforces regulations governing claims made about the R-value of home insulation. Manufacturers and installers of insulation products are subject to substantial fines for breaking the rules. Excerpts from the regulations are provided below to help suppliers and installers of insulation products provide accurate and full disclosure of R-value information to customers. Exact quotes from the regulation appear below. Explanations and comments which are not contained in the regulation appear below in **bold regular** type.

What this regulation does.

This regulation deals with home insulation labels, fact sheets, ads, and other promotional materials...Breaking any of its rules is an unfair and deceptive act ...You can be fined heavily (up to \$10,000 plus an adjustment for inflation under Sec. 1.98 of this chapter) each time you break a rule.

Who is covered.

It includes manufacturers, distributors, franchisors, installers, retailers, utility companies, and trade associations.

When the rules apply.

You must follow these rules each time you import, manufacture, distribute, sell, install, promote, or label home insulation.

R-value tests.

To get the R-value for a specific emissivity level, air space, and direction of heat flow, use the tables in the most recent edition of the American Society of Heating, Refrigerating, and Air-Conditioning Engineers' (ASHRAE) Handbook.

Note: The table in the ASHRAE Handbook that lists R-values for air spaces has a footnote, "Values apply for ideal conditions, i.e., air spaces of uniform thickness bounded by plane, smooth, parallel surfaces with no air leakage to or from the space."

If you claim R-value for an air space be sure to ask yourself the following questions: Does the air space meet the ideal conditions as specified in the ASHRAE handbook? Does the air space which is formed by vinyl siding or brick offer the uniform, smooth, surfaces with no air leakage to or from the space? What is the likelihood of the home meeting these ideal conditions? What happens if the conditions are not ideal? What R-value will your system provide under real life conditions versus ideal conditions?

Labels

You can also show the R-value of the insulation when it is installed in conjunction with an air space. This is its "system R-value". If you do this, you must clearly and conspicuously state the conditions under which the system R-value can be attained.

How installers must handle fact sheets.

If you are an installer, you must have fact sheets for the insulation products you sell. Before customers agree to buy insulation from you, you must show them the fact sheet(s) for the type(s) of insulation they want.

What installers must tell their customers.

If you are an installer, you must give your customers a contract or receipt for the insulation you install...For aluminum foil, the receipt must show the number and thickness of the air spaces, the direction of heat flow, and the R-value.

Now that you understand the regulations governing R-value claims, show this to your customers and put them on your side. It will enhance your professionalism and CREDIBILITY.