



Engineered Thermal Performance™ and the FTC R-value Rule

Whenever Engineered Thermal Performance™ is used to determine the amount of spray foam insulation that is to be installed, it is still necessary to comply with the requirements of the FTC R-value rule. The FTC Rule requires that the installed R-value of the insulation be stated on an Insulation Fact Sheet, provided by the insulation manufacturer, to be left at the building site.

There is only one meaning of R-value that is recognized by the FTC – which for spray foam is based on measurements of a clearly defined test method published by ASTM. Thus, any mention or use of terms such as “equivalent R-value”, “lab R-value”, or “initial R-value” are inappropriate. The actual R-value of Sealite™ or InsulStar®, as measured by the specified test methods, must be stated on the Insulation Fact Sheet provided by NCFI. The documentation prepared for building inspectors by Craig DeWitt, Ph.D., C.E., should be attached to the Fact Sheet for reference for the building inspector or any other interested party.

For example, if the code prescribes R-13 insulation in the walls, only 1.5 inches of InsulStar®, or R-10 is sufficient to meet the code according to its ETP™. Thus the Fact Sheet would state that the walls are insulated with R-10 of InsulStar®, but the accompanying document from Dr. DeWitt would be attached to certify that the wall meets code by the performance path.

We have attached relevant excerpts from the R-value rule for your reference.



FTC R-value Rule Excerpts for Spray Foam Manufacturers and Applicators (16 CFR 460)

§ 460.13 Fact sheets.

If you are a manufacturer, you must give retailers and installers fact sheets for the insulation products you sell to them. Each sheet must contain what is listed here. You can add any disclosures that are required by federal laws, regulations, rules, or orders. You can add any disclosures that are required by State or local laws, rules, and orders, unless they are inconsistent with the provisions of this regulation. Do not add anything else. Each fact sheet must contain these items:

(a) The name and address of the manufacturer. It can also include a logo or other symbol that the manufacturer uses.

(b) A heading: "This is _____ insulation." Fill in the blank with the type and form of your insulation.

(c) The heading must be followed by a chart:

(1) If § 460.12(b) requires a chart for your product's label, you must use that chart. For foamed-in-place insulations, you must show the R-value of your product at 3 1/2 inches. You can also show R-values at other thicknesses.

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(e) After the chart and any statement dealing with the specific type of insulation, ALL fact sheets must carry this statement, boxed, in 12-point type:

READ THIS BEFORE YOU BUY

What You Should Know About R-values

The chart shows the R-value of this insulation. R means resistance to heat flow. The higher the R-value, the greater the insulating power. Compare insulation R-values before you buy. There are other factors to consider. The amount of insulation you need depends mainly on the climate you live in. Also, your fuel savings from insulation will depend upon the climate, the type and size of your house, the amount of insulation already in your house, and your fuel use patterns and family size. If you buy too much insulation, it will cost you more than what you'll save on fuel. To get the marked R-value, it is essential that this insulation be installed properly.

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§ 460.15 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. You can decide how to do this. For example, you can give each customer a copy of the fact sheet(s). You can keep the fact sheets in a

binder, and show customers the binder before they agree to buy.

§ 460.16 What new home sellers must tell new home buyers.

If you are a new home seller, you must put the following information in every sales contract: The type, thickness, and R-value of the insulation that will be installed in each part of the house. There is an exception to this rule. If the buyer signs a sales contract before you know what type of insulation will be put in the house, or if there is a change in the contract, you can give the buyer a receipt stating this information as soon as you find out.

§ 460.17 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 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.

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§ 460.18 Insulation ads.

(a) If your ad gives an R-value, you must give the type of insulation and the thickness needed to get that Rvalue. Also, add this statement explaining R-values: “The higher the Rvalue, the greater the insulating power. Ask your seller for the fact sheet on R-values.”

(b) If your ad gives a price, you must give the type of insulation, the R-value at a specific thickness, the statement explaining R-values in paragraph (a) of this section, and the coverage area for that thickness. If you give the price per square foot, you do not have to give the coverage area.

(c) If your ad gives the thickness of your insulation, you must give its R-value at that thickness and the statement explaining R-values in paragraph (a) of this section.

(d) If your ad compares one type of insulation to another, the comparison must be based on the same coverage areas. You must give the R-value at a specific thickness for each insulation, and the statement explaining R-values in paragraph (a) of this section. If you give the price of each insulation, you must also give the coverage area for the price and thickness shown. However, if you give the price per square foot, you do not have to give the coverage area.

(e) The affirmative disclosure requirements in § 460.18 do not apply to ads on television or radio.

For the complete Rule see: <http://www.ftc.gov/bcp/rulemaking/rvalue/16cfr460.shtm>