



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
600 PENNSYLVANIA AVENUE, NW
WASHINGTON, D.C. 20580

Division of Enforcement
Bureau of Consumer Protection

April 6, 2005

VIA CERTIFIED MAIL

Michael Boulding, President
Reflective Insulation Manufacturers Association
4519 E. Lone Cactus Drive
Phoenix, Arizona 85050

Dear Mr. Boulding:

Thank you for your February 28, 2005 letter regarding the labeling and advertising of reflective insulations. We appreciate the efforts RIMA has made to provide its members and consumers with information on R-value claims made for foil-faced bubblepack or foam products used in concrete floor systems. To aid the compliance efforts of industry members, I am providing more detailed information about this issue and the FTC's Rule for Labeling and Advertising of Home Insulation ("R-value" Rule) (16 C.F.R. Part 460). Please feel free to distribute this letter to your members and others who may have an interest in the issue. We strongly urge industry members to review their claims for these products if they have not done so already and to ensure that their advertising does not overstate the performance of these materials when installed under concrete.

Section 460.5(b) and (c) of the Rule requires industry members to use specific test procedures for measuring the R-value of reflective insulations with single and multiple sheets. The Rule also contains requirements for measuring and labeling the "system R-values" of insulation materials with foil facings (§ 460.5(d)). Manufacturers must provide R-value information for their insulation on labels, in fact sheets, and, in certain circumstances, in advertising.

It is the staff's understanding that some industry members have marketed foil-faced bubblepack or foam products used in concrete floor systems claiming that such products provide a relatively high R-value (e.g., R-5 to 10) and provide significant thermal performance through their reflective qualities. The FTC staff is concerned that such claims may be misleading and could harm the ability of builders and other consumers to make appropriate insulation choices. It is well accepted that reflective insulations must have an air space adjacent to the reflective material to be effective. Such air spaces are unlikely to exist under concrete slabs. We are unaware of data to suggest that the reflective qualities of these products will yield any significant benefits when they are installed under slabs. In essence, foil-faced material installed in such a way is unlikely to function as a reflective insulation. Instead, any significant insulation benefits are likely to stem from the product's mass (not reflective) insulation qualities. As the FTC staff