**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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*BER Comment : We are against the the inclusion of orientation in wall modeling because doing so would drastically increase the amount of pictures/documentation required to sufficiently cover every wall in every orientation to accurately represent these changes. It is unclear how much of a noticeable impact orientation has on opaque wall assemblies to justify this type of change to modeling.*

**Proposed Change to the Draft Standard\***  
*Use “strikethrough” and “underline” formatting to indicate all proposed changes. Changes must be shown with “hard-formatting” strikethrough and underline, not “track changes”.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Areas of an assembly having different insulation types~~, orientation~~, or R-Value ~~(including uninsulated areas in excess of 5 percent of any otherwise insulated building component)~~ shall be modeled separately with the applicable R-Value~~, orientation~~, and assembly areas associated with each different insulation situation.