**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Section 806 of the 2021 IRC explains the requirements for installing air-permeable insulation to the underside of a roof deck in an unvented attic. There are already three exceptions to the six-sided encapsulation rule (Sec A.1.1.2.1 a, b and c) and the rule, as currently written, unfairly favors the producers and installers of air-impermeable insulation such as polyurethane foam, which is carbon-intensive.

**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”.*

*Use a color other than red to indicate proposed changes to the draft.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

### A.1.1. 2. Air Barrier Requirements

#### A.1.1.2. 1. Insulation shall be enclosed with air impermeable materials on all sides except for the following:

#### Insulation installed in vented attics above ceilings shall not require an air impermeable material on the exterior side.

#### Insulation installed under floors directly above an unconditioned basement shall not require an impermeable material on the side facing the basement.

#### Insulation installed in rim or band joists shall not require an air impermeable material on the interior side.

1. Air permeable insulation applied to the underside of a roof deck in an unvented attic.