**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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Within the Continuous Insulation “product type”, products can be similar but NOT comparable. For example, a polyiso insulation board may be installed directly to the framing to meet the requirements of thermal insulation (R-value), provide the Water-Resistive Barrier (WRB), and act as the Air Barrier all while complying with fire requirements. Polyiso is often manufactured to a specific thickness to meet the code required R-value. The product acts as a multifunctional element.

If this is the Basis of Design and changed in the field with a stone wool product, the wall assembly will not be the same. The thickness of the wall will increase because the R-value per inch is less. The structure may need to be modified as the product is 2 to 5 times the density. Due to the weight of the product the “fasteners” often include intermittent or continuous z-girts that are often not included in the GWP calculation and would be excluded by this document. Further, often the attachment methods (increasing thermal bridging) for heavy products are excluded for the U-factor calculation. Stone wool product cannot act as the WRB or the Air Barrier and would then require the addition of an exterior gypsum wallboard to be the rigid backing material for the installation of an additional product or products that are then not included in this estimate.

Therefore, it is critical to look at the performance of an assembly of products and not just product alone.

**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.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

3 Definitions

~~Comparable~~ Product Type – Building products within the same Product Category Rules (PCR) that are ~~identical or materially~~ similar to the reference product in terms of critical-performance – composition (e.g. density, thickness), function(s), product performance, assembly performance, manufacturing, installation, and meeting the same code requirements.