

**Sto Corp.**

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January 22, 2008

Mr. Steven Thorsell
Director of ICC-ES Projects
ICC Evaluation Service, Inc.
4051 West Flossmoor Road
Country Club Hills, IL 60478

RE: Proposed Revisions to the Acceptance Criteria for Water-resistive Barriers
Subject AC38-0208-R1 (ST/MB)

Dear Mr. Thorsell:

Sto Corp. has the following comments regarding the proposed addition of air barrier material property evaluation to AC38.

While we do not object to recognizing air-barrier performance of a material, we have some concern about placing the requirements in AC38. ASTM E 2178 provides an air leakage value but does not address air leakage under both positive and negative pressures. It also does not address effects of wind pressure cycling from positive to negative on the air leakage of the material when it is installed as it would be in the field. ASTM E 2178 does not require use of fasteners which would penetrate products recognized under AC38, and therefore the data could be misleading.

That being said, if the committee decides to proceed with the changes as proposed, it is our opinion that the same language for recognition of air barrier material performance should be simultaneously added to AC212, "Acceptance Criteria for Water-resistant Coatings Used as Water-resistive Barriers Over Sheathing."

AC38 deals with water-resistive barrier sheet goods and AC212 deals with water-resistive barrier coatings. Both types of materials can function as air barriers when properly installed.

The technical aspects of the testing and the acceptance criteria are the same for both types of products. Discussion pertinent to AC38 would also be pertinent to AC212 and, therefore, the subject should not have to be revisited simply to add similar wording to AC212. We recognize that AC212 is not an agenda item, but we hope the system will allow consideration of this for efficiency.

Respectfully,

A handwritten signature in black ink, appearing to read "Terry L. Viness".

Terry L. Viness, P.E.
Senior Technical Services Manager
Sto Corp.