**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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References: ASHRAE, ICC, & BSR. (2025). Standard 240P: Quantification of Life Cycle Greenhouse Gas Emissions, Second ISC Publication Public Review Draft. ASHRAE.

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

1. Industry-average EPD for comparable product type when product manufacturer is listed on the EPD
2. Industry-average EPD for comparable product type
3. Benchmark value for comparable product type in accordance with section 5.3.3.
4. LCA for comparable product type
5. For MEP products, default values from Table 10.1.5.