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

This document is inherently flawed; it has not undergone ANSI standards development process, and for a standard that could radically shape how our industry does business, it should have followed the ANSI process.

There are many nuances and specifics of energy rating/code compliance verification inspections that are not included in this document that should be.

This entire document should be rejected, and instead RESNET should make reference to the ICC recommendations for remote virtual indpsections where a jurisdiction is interesteed in implementing them :

[https://shop.iccsafe.org/recommended-practices-for-remote-virtual-inspections-rvi.html?\_gl=1\*1izutgl\*\_gcl\_au\*MTQxNjcxNjI5Ny4xNzIxOTk5OTkw\*\_ga\*NjA4NDIzMTEuMTcxMjkyOTg2Ng..\*\_ga\_XBEJZJQ4C3\*MTcyODkxNzAzOC40OS4wLjE3Mjg5MTcwMzguNjAuMC4xMzM1OTc4MzE2](https://shop.iccsafe.org/recommended-practices-for-remote-virtual-inspections-rvi.html?_gl=1*1izutgl*_gcl_au*MTQxNjcxNjI5Ny4xNzIxOTk5OTkw*_ga*NjA4NDIzMTEuMTcxMjkyOTg2Ng..*_ga_XBEJZJQ4C3*MTcyODkxNzAzOC40OS4wLjE3Mjg5MTcwMzguNjAuMC4xMzM1OTc4MzE2)

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

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

It doesn’t make sense that RVI’s be restricted to 3 stories when 301 permists ratings on dwelling units in any size structure.

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

**101.2 Scope.** This standard is applicable to all one- and two-family dwellings and to dwelling units in residential buildings ~~three stories or less in height above grade plane~~ as described in ANSI/RESNET/ICC 301-2022.

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

As videos/photos can be manipulated or altered, remote inspections need to be live-streamed or viewed in real time to avoid any falsification with no other alternative to be a comprehensive and adequate replacement for in-person inspections.

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

**~~302.2.2.~~** ~~At the~~ *~~inspector~~*~~’s discretion, in areas within the jobsite where there is an insufficient Internet/Wi-Fi signal or cell service, the~~ *~~in-field representative~~* ~~may take video and/ or photos and provide those to the~~ *~~inspector~~* ~~for evaluation.~~

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

Location verification should be mandatory whenever an RVI is being performed.

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

**~~303.2 Verification of site by GPS/geotagging.~~** ~~Where required by the~~ *~~inspector~~*~~, location shall be verified through GPS/Geotagging where the service is applicable.~~