**Comment/Explanation\*:**

1. **Remote inspections are probably the best answer for this situation, but we think there should be some amount of on-site inspections as well, especially if we want buy-in from the EPA and DOE (Elliot told me the Energy Star program is not interested in pursuing remote inspections, currently). We propose inspections follow a similar process to the sampling protocol. That is, a number of modules are inspected by a credential Rater or RFI in person first, and then once consistency is established, inspections can move to remote. If issues are uncovered during remote inspections, the factory should have to requalify for remote inspections by submitting to another number of modules inspected in person. This brings legitimacy to the process and gets both the factory and the Rater motivated to not let things slide. If there was no on-site visit other than the initial training, we could see fraud being quite easy. Perhaps a “sampling plan” of sorts should also be provided to the provider for every modular project like this as well so providers can plan for additional oversight and QA.**
2. **Another suggestion we have is that this committee develop alongside SDC 1400 which is attempting to create a formal protocol for remote code inspections. Elliott from Energy Star is actually on that committee (as are we) so it could really sort of give the EPA and DOE a wholistic picture of how things could work well for their programs. It might also save this committee some time by piggybacking off what SDC 1400 has already worked on so far.**
3. **One strong comment we have concerns video surveillance of workstations as verification. We feel that that could create a hostile work environment for factory workers and not set things in a positive, collaborative light. It’d also be a massive amount of data and take forever to share if these videos have resolution quality worth using for verification. We’d need good resolution to truly tell if insulation is compressed or not and that means HUGE files if they’re running 9-5. If our suggestions 1 and 2 above are used, then photos and/or short videos clips should be plenty of evidence for verification.**
4. **Another strong comment we have is that a credentialed factory member could work, but they would still have to work very closely with a Rater in order for anything to still be called 3rd party and unbiased. That is, it should still be the Rater in the end who decides if something is verified or not and the credentialed factory worker would just be trained to provide photo/video evidence to the Rater in a way that leaves the least amount of room for fraud possible.**

*Please be as specific as possible as to what should be changed and why.*  
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