**Comment/Explanation\*:***Please be as specific as possible as to what should be changed and why.*
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**Comment 2 - Start with mandatory chronologically catalogued and geotagged still imagery, with continuous recording as optional.**

Regarding:

**Option 1 – Virtual/Remote Inspection of Factory Built Components**

Protocols for Virtual/Remote Inspections for Off-site Construction

**Plant/Factory Requirements**

1. Continuous or near continuous recording of work performed at all stations that impact the HERS Ratings and any energy efficiency program (EEP) that is being considered for compliance.

**Suggestion:**

A modular plant working with a HERS Rater to Development a Remote Inspection QA Addendum for the Plant QA Manual/Plant QA Guide that defines a balance between "Rater Sourced" vs. "Plant Sourced" photo documentation, and tracks “Rater Verified" vs. "Builder/Plant Verified" inspection criteria is all that needed.

Continuous or near continuous recording **or** chronologically cataloged geotagged still imagery of work performed may be used by the HERS Rater when verifying minimum rated features for HERS Ratings

Continuous or episodic video monitoring does not provide the quality control that is expected from a HERS Rater. This video method is useful for broad perspectives of the building components, insulation installation and also provides information on the progress of a build, or a general assessment of the building process. Moreover, above the function of assembly QA, video surveillance is highly valuable for plant safety monitoring.

The use of photo documentation of specific (minimum rated) features captured by an individual is integral to each box inspected during construction. This method certainly cannot be used if RESNET is seeking to retain a reputation for the gold standard of quality. In addition to required chronologically cataloged (time stamped), geotagged photo documentation, video monitoring systems may be used to verify a limited number of features.

Whether video or photos are used, the certified rater would still be responsible for confirming “Verified” from either “Rater Sourced” or “Plant Sourced” documentation.

Clarify what “all stations that impact the HERS Ratings” means. Should plants install a continuously monitoring video camera at the tip of each caulk and foam gun? I do not know how else you would see if you’ve sealed 360 degrees around plumbing and wire penetrations. If this is considering the construction personnel as “the stations” wouldn’t it be more effective for everyone working to wear body cams? Define a list of “the stations” are ceiling girders, cat walks, gantries, hydraulic jack stations, grease pits or the faces of robots as part of the plant inspection protocol documentation.