**Comment/Explanation\*:***Please be as specific as possible as to what should be changed and why.*  
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This is certainly a robust starting point for a pilot program of this nature. I only question if there is some potentially inefficient duplicity of oversight for factories during fabrication when there are already third party inspections. The program seems to anticipate this and allow for inspectors to serve multiple purposes, however it’s unclear how this would play out in practice given the various requirements necessary for inspectors.

It does raise questions about when offsite construction can be treated truly as manufacturing and not have to be subject to the same types of inspections that are required for site constructed projects. In a factory environment, it should be about certifications, standards, and occasional spot inspections for QA/QC programs. Variability in assembly simply doesn’t occur in a factory to the degree that it does in the field. Does the RESNET board require continuous full third party inspections to ensure that window manufacturers are producing compliant products as well? Or are packaged HVAC systems under constant inspection scrutiny? Sooner or later, we need to break the habit of treating factories like a disparate collection of unrelated subcontractors that is common in site construction which causes the need for strict oversight and inspections. Offsite construction is manufacturing and should be treated as such.