

From: [Liza Bowles](#)
To: [ENERGY STAR Homes](#)
Subject: Request for Information: ISO/IEC 17065 Verification Oversight for the ...
Date: Wednesday, November 21, 2018 12:35:10 PM
Attachments: [image001.png](#)

Sorry for the late comments. I just saw the request for comment and understand that we missed the cutoff date but offering our thoughts as a HERS rater organization.

1. The housing market is currently not particularly strong. Programs tend to gain market share in strong markets, and lose market share in weaker markets. Additionally, the more complicated the program, the lower the participation rate.
2. The ES program is already expensive. The certifications a rater needs to carry, the expense of the provider create an administrative cost burden. The role of the provider is always being strengthened and it increases costs on raters. There is little left for the rater (who is actually doing the work) at the end of the process. It should not be further complicated and costly by layering ISO on top of it.
3. The non-profit requirement at a minimum keeps the top tier of administration less costly and eliminates any possible conflict with for profit groups running similar programs.

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