

**FHFA RFI Response**

February 26, 2021

# Appraisal Policy and Process Improvements

## General Questions on Appraisal Policy and Process Improvements

*Question A1.1: Is there a need to provide new valuation solutions that address industry identified issues of appraiser capacity, turn-times, training, and rural and high-volume market coverage? What are those potential solutions? What are the risks of these policies and the challenges in implementing them?*

The need for new solutions is certainly here. The current lender/AMC/appraiser model is broken. This becomes painfully clear every time there is a refi-boom. Turn times dramatically increase. Appraisal costs rise. Appraisers are overwhelmed. AMCs lose money. And the consumer/borrowers – especially those who are not subject to waivers – often suffer the most. This must change and it becomes more urgent each year as the number of appraisers continues to decline.

Our primary objective in responding to this RFI is to advocate that the FHFA:

1. Quickly allow the GSEs to reintroduce and significantly speed up test and learn projects for the bifurcation of the appraisal, thereby engaging the industry toward building professional, third-party inspection workforces.
2. Expand on what is now limited development and testing of consumer aided inspections for use on low-risk loans, to create well thought-out requirements and standards for the use of consumer inspections in the lending process.

**Solutions**

1. Hybrid Valuations – Bifurcating the Appraisal

The bifurcation of the appraisal process has some challenges, but it also holds great promise. Based on the small volumes of Value Verify we performed (other AMCs have seen the same thing), the use of third parties for inspections improved turn-around times as long as the GSEs allowed a competent inspector – other than an appraiser – to complete the inspection. Upon interviewing multiple appraisers, it is believed most are open to the change, provided that the assisting third party inspectors possesses requisite knowledge, geographic competency, adequate training, and experience. While there may be nominal risk, it is believed the GSE’s appraisal data retention in addition to enhanced quality control will isolate potential errors and quality concerns.

1. Select use of consumer-aided inspections for lower-risk loans

We strongly believe that the use of consumer-aided inspections now has a place in the appraisal/valuation future state. It was encouraging to see the GSEs open the door to the use of consumer-aided inspections during the early stages of the pandemic. But when lenders learned that the GSEs would not rep and warrant to the loans that involved a consumer inspection, lenders largely walked away from exploring this approach. We think this is a missed opportunity. We know there has been some limited test and learn projects on consumer inspections with the GSEs and we hope that the FHFA will encourage and promote and greatly expand on these tests (see our recommendation below).

With or without the GSEs, however, the industry has already begun early-stage adoption of the consumer inspection in other mortgage industry channels:

**Home Equity** – for low-risk loans the consumer inspection, which provides for exterior and interior inspection, is being tested to replace an exterior-only inspection done by a third party. Inspex, our consumer-aided solution, is currently in a live pilot with one of the top ten home equity lenders. While regulators have not “approved” the approach, they are aware of our live testing and our methodology. Of course, we need a lot more data (volumes are small as the program began late last year), but early results are encouraging – the approach has improved turn times and lowered the cost of originating loans. In addition, after using Inspex consumers are providing positive feedback on our consumer inspection process. This solution also includes our proprietary Valuation Assist pre-screening technology. This tool automatically filters out properties that may be too complex for a consumer aided inspection *before* the consumer is ever engaged in the process.

**PMI Release** - We are in the early live-testing stages of replacing a BPO performed by an agent with a desktop appraisal in which the inspection is completed by the homeowner. (see below for a more detailed explanation of the safeguards used to prevent interested party bias and/or possible fraud in the use of a consumer inspection mobile app). We think this approach also holds promise for disaster assessments.

**Our Recommendation: start with consumer inspections as a supplement to waivers**

When you combine the fact that agency loan credit quality is as good as it has been in decades, along with an ongoing need for property condition to be refreshed frequently, the best place to start developing and testing consumer-aided inspections is in conjunction with waivers.

If the expanded use of third-party inspections is the first step, then engaging consumers in the inspection process is the logical next step, especially for lower-risk loans with waivers.

It is probably too early to start using consumers to directly replace an inspection by an appraiser for traditional loans. For one thing, the technology is not here yet to conduct an automated sketch of a property’s exterior and interior easily and quickly. Since properties/loans eligible for waivers don’t need a sketch, this is another reason to take a hard look at the use of consumer inspections as a supplement to waivers.

In the lower-risk environment of waivers, now is also a good time to begin formulating the guidelines and standards that will be needed to ensure there is no increased risk.

**Risks and Challenges**

While there is no specific federal regulatory prohibition on the use of consumer inspections (the focus is on “independence” as to the estimated value), adopting the use of consumer inspections for purchase and refinance appraisals faces numerous challenges. First, as stated above, the technology is not yet here to allow a consumer to produce a sketch of their home seamlessly and easily, however that technology is advancing. Even if it was here now, our experience shows that there is a limit to how much time we can ask the consumer to engage in an inspection. Also, the current inspection requirements to support a 1004/Form 70 appraisal would have to be reduced for consumers to participate effectively. With waivers, the GSEs are already willing to lend without an inspection or appraisal, we think that using consumer inspections as a supplement to waivers is the best place to begin expanded testing and analysis.

*Question A1.2: Are there opportunities for process improvements that allow non-traditional valuation services (inspection-only, desktop, exterior-only) to augment traditional appraisals? Please elaborate on the risks, challenges and benefits. Separately, are there opportunities to improve traditional appraisals to mitigate problems and concerns that have been observed to date?*

**Risks and Challenges**

The risks in moving beyond the traditional 1004/Form 70 approach to appraisals are real – but the risks in not adapting to the unavoidable realities of the marketplace are perhaps even more significant.

Just looking at the dramatic decline in the number of appraisers to the increase in the use of GSE waivers underscores the point.

What this tells us is that we are at a crossroads, where the appraisal’s data/analytic component and its inspection component diverge. Having appraisers “do it all” when it comes to completing an appraisal will only continue to put strains on the industry. The bifurcation of the appraisal must now be one of the primary process changes to solve the appraisal challenge. This will mean building new and professional alternative third-party workforces as well as doing the groundwork now to make consumer-aided inspections a viable alternative for some loans.

One of the biggest obstacles facing us right now is the lack of data and analytics to support the efficacy of other approaches, including exterior-only appraisals or bifurcated appraisals. We understand that the GSEs have some critical data regarding the use of exterior only and desktop appraisals used during the pandemic. We hope the FHFA can share these results with the industry.

Initially, having a consumer/borrower inspect their own home also raises some issues. For example, having the borrower act as the inspector of a property certainly raises concerns about interested party bias and/or fraud. However, in addition to the safeguards and checks and balances that are already available in the better consumer inspection apps (geo-fencing, etc.), there are also ways to mitigate potential interested-party risk. One way would be to supplement an exterior or desktop appraisal with a consumer inspection. Again, the challenge is this – how can we test and compare the results of a traditional appraisal to alternatives such as exterior only or those in which the consumer provides the inspection? We have some data to offer in the home equity channel (see below). We are hoping that the GSEs have more data and analytics based on the increased use of alternatives during the pandemic. The argument is that, if the data shows that exterior-only appraisal does not compare favorably to traditional appraisals for certain properties, then perhaps this can be mitigated by having an appraiser drive by the property and have the consumer *also* perform an interior inspection.

Finally, there is also a need to bring investors along and make them comfortable with alternative approaches and we will need a lot of test and learn data to make this happen as well. We think the FHFA must lead in this regard and do so in such a way that the industry is convinced that, subject to proper testing and analysis, the GSEs have a green light to innovate.

**Benefits/Solutions**

Solutions for Rural Properties

Even before the pandemic hit, appraising rural properties was a growing problem. Now it is on the verge of a crisis. We see turn-around times of many weeks or even months to find competent appraisers in rural markets. Even then, geographic competence/distance guidelines must be stretched substantially. Finally, the costs associated with these appraisals are often significantly higher and, where rural properties are often more accessible for low-to-moderate income homeowners, higher appraisal costs can add to affordability issues. Here are some possible solutions to rural appraisal challenges:

1. Revisiting and Expanding the use of Bifurcated Appraisals

When Fannie Mae announced Value Verify in 2019, many in the industry were very excited about the possibilities. The concept of separating the two main functions of an appraisal – the inspection and the analytics behind value estimation – made a lot of sense. In the old days, many appraisers used trainees to perform the inspections to train and develop new appraisers. So perhaps there is no better way to help streamline appraisals and reduce the log jam due to a limited number of licensed certified appraisers in rural markets and elsewhere than to open the inspection process to new labor pools.

This does not mean we advocate that anyone can perform the inspections. There needs to be training, accountability, and perhaps even certification (see labor pool analysis below). But the possibilities for developing and using new labor pools for inspections are numerous. Insurance adjusters, independent inspection companies, and real estate agents come to mind. For example, there are about 70,000 appraisers in the US and about 700,000 real estate agents. With the proper training and safeguards in place, agents and/or insurance adjusters can immediately help compensate for the lack of appraisers in rural markets. This would go a long way in solving at least half of the problem of getting timely rural appraisals. With the inspection problem solved, there is no better place to introduce desktop appraisals than in rural markets (see below for our experience with Value Verify).

1. Combining a Consumer Inspection with a Desktop Appraisal

Another possible solution is to have the consumer/borrower in rural markets perform the inspection and then have a licensed, certified appraiser perform a desktop appraisal. There are essentially two ways to leverage the use of the consumer performing the inspection. Some companies have developed mobile apps that allow the appraiser to “virtually walk through” the house with a face-time-like application that lets the appraiser direct the consumer where to take photos. This certainly has applications in rural markets. The other approach is to provide the consumer with an easy-to-use mobile app with tutorials and guides to allow consumers to complete the inspection on their own. This approach eliminates the need for scheduling, etc. – one of the most cumbersome aspects of completing the inspection.

For either of these solutions to work, however, the GSEs must be willing to forgo a sketch and there will need to be some changes in the way geo-competency requirements are interpreted, given the new technologies that can allow appraisers to be geo-competent from farther distances than before.

*Question A1.3: Do appraisal waivers have a place in Enterprise appraisal policy and process, and if so, for what segment of loans? What are the current risks to Enterprise safety and soundness in how appraisal waivers are offered? Would caps or other limits on their usage be appropriate?*

With the increased accessibility to public and MLS data, as well as the impressive GSE archives of prior appraisals, waivers make a lot of sense and are already helping with the backlog on appraisals. We absolutely think they have a place. The issue with waivers is the possible degradation of accurate and timely subject property condition information. As more waivers are granted, fewer appraisals get done, which means fewer inspections. It seems to us that a great way to address this problem is to consider supplementing waivers with consumer-aided inspections. This approach might even increase the number of possible waivers that can be granted, filling in the current large gap between a waiver and a traditional appraisal. If the GSEs are willing to grant a waiver (without an inspection or an appraisal) then some of the risk issues with a consumer-aided inspection go away.

Another consideration with waivers – with the recent explosion in the use of GSE waivers due to the pandemic, the industry has not yet caught up to the reality of what impact waivers are having on appraisal pricing. Waivers apply to properties which are: (a) the least complex (b) those with the most robust data, and (c) those in homogenous markets. With waivers approaching over 25% in many markets, the properties that remain are, inversely, likely to be more complex properties located in less homogenous or even rural markets. While sophisticated lenders often have appraisal pricing differentiated for urban, suburban, or rural markets, there is not enough attention being paid to the increasing frequency of properties that simply cost more to appraise. As more waivers come online, appraisal prices need to rise for the remaining properties. This is especially true in rural markets.

Finally, very few folks in the industry have any idea how waivers work or how the GSE’s use data and analytics to decide which properties are eligible for waivers. More transparency here would go a long way in getting industry players more comfortable with the approach.

*Question A1.4: Would utilizing alternative inspection workforces, such as insurance adjusters, real estate agents, and appraisal trainees assist with addressing appraiser capacity concerns? Are there risks of using third-party non-appraisers? If yes, How?*

The use of alternative inspection workforces in the mortgage industry has been growing tremendously over the past 5-10 years. In home equity lending, if an AVM is not used, most valuations and desktop appraisals now utilize hybrid appraisals, using mostly real estate agents as inspectors. We have completed tens of thousands of these hybrid valuations over the years and there has been no significant increase in risk or accuracy of the estimated value. However, since most of these valuations involve mainly exterior-only inspections, the real estate agents have had very little interaction with the borrowers. Of course, for purchase and refinance loans where there is no waiver, an interior inspection may be prudent. This changes the dynamic and means that a lot more attention must be paid to things like: Who is going into the property? What are their qualifications? How can we ensure that there is independence and no conflict of interest?

At the heart of the matter is the need for accountability, competency, and professionalism. On the one hand, using real estate agents to perform inspections makes a lot of sense. They could lose their license if they were to violate the ethics of their profession. Agents also generally know and understand real estate and markets and they are reasonably professional. On the other hand, most real estate agents are not competent with performing a sketch, for example, and our experience over the years has found this issue to be significant. There is also the concern about a real estate agent using the inspection process to leverage a possible future listing, which would present a serious conflict of interest.

Here are some suggestions on how to go about developing a professional alternative workforce for inspections:

* Appraiser trainees. Make it easier for senior appraisers to leverage trainees for inspections. Today, there are too many restrictions and obstacles, as well as liability concerns, in the way trainees are used.
* Sketches. Simultaneously work toward (a) supporting via test and learn projects new sketch tool technologies and (b) remove the sketch requirement from certain low-risk loans.
* Certification. Bringing a set of standards to the inspection process is critical. While training is a very big part of improving the labor pool for inspections, there also needs to be a formal, industry-wide certification process. The GSEs could help by working with the industry to make this happen.
* GSE Commitment. If the industry believes that the GSEs are committed to the bifurcation approach, then appraisers, AMCs, and other companies will engage.

*Question A1.5: Is there a need for additional policies and controls to balance potential risks with efficiency benefit from appraisal modernization? If yes, please provide your recommendations.*

See Answer to B2.6

*Question A1.6: Do the objectives as outlined for the UAD update and forms redesign meet the current and future needs of the mortgage industry? Are there opportunities for refinements or additions?*

Yes. The redesign efforts will help meet the industry’s future needs. The UAD initiative to move away from forms and more toward an interactive approach makes a lot of sense. However, this will require significant cooperation between the GSEs and the lenders and technology companies who build and develop the forms engines.

# Risk Management

## Questions on Risk Management

*Question B2.1: How could the Enterprises make additional data available to appraisers while promoting appraiser independence without crowding out other data providers? What additional challenges arise if the enterprises provide data to appraisers?*

The data is out there. Public records and MLS data are ubiquitous in many markets. The problem is that there are many different companies and approaches to the problem of gathering and analyzing all the data and providing it to appraisers. We all know about the challenge of reconciling different data sets on the same property.

If the goal is to get appraisers more data while balancing the need for independence, the first step in achieving this goal is to standardize the methodology for the existing/emerging data gathering/processing technologies. This will ensure that the data and/or applications are processed in generally the same way.

Look at the Automated Valuation Model space, for example. Approaching the problem differently is fine – and test results show that different AVM approaches can work and achieve similar results. However, there are still no standards for how AVMs are calibrated and tested. When it comes to appraising, what if there were a general standardized data gathering and analytical model methodology that companies would have to adhere to? Of course, this methodology would have to be USPAP compliant. But this doesn’t mean that everyone would have to approach the problem the same way. Instead, with some standards, the market would adapt within certain guidelines and we think this would open the door to solving the problem.

*Question B2.2: How can the Enterprises improve their collateral tools currently available to lenders?*

In addition to the answer above, we think that encouraging and allowing for the use of pre-assignment collateral screening tools is critical to the industry. Of course, the GSEs use some pre-screening proprietary methodologies to determine the use of waivers today. But there is no transparency to these methods. It would help if the data the GSEs have on a subject property is shared with AMCs *before* an appraisal assignment is made. It would also be beneficial if the GSE/CU/LCA errors were presented to the appraiser immediately upon completion of the appraisal and prior to delivery to the AMC.

Also, what happens when a waiver is not offered?

This issue arose during the Value Verify pilots. The “data and done” eligible loans did not have screening criteria outside of loan and property type characteristics. There was no screening eligibility where if the estimated property value was out of range or if there were known missing or ineligible property details/history that would require a 1004P; it did not provide the 1004P eligible message code (See answer to B2.6).

Xome has developed a proprietary property screening tool called Valuation Assist. Details can be provided at a later date.

This up-front screening provides instantaneous eligibility so lenders can choose from an AVM with Inspection, Desktop Appraisals, or move to a more traditional valuation product based on screening results – all before a valuation assignment is made.

This tool is a critical part of our Inspex process that uses consumer-aided inspections. Some properties, for example, may be too complex for a consumer aided inspection. Valuation Assist screens for property complexity and other factors *before* the consumer is asked to engage.

*Question B2.3: How do Enterprise appraisal waiver offers differ between Freddie Mac and Fannie Mae? Are both Enterprises equally likely to offer a waiver on a given property? Please elaborate.*

N/A.

*Question B2.4: How can lenders manipulate automated underwriting systems when seeking an appraisal wavier? For example, lenders changing the loan amount, submitting data changes multiple times, or submitting to both Enterprises and delivering to the one who offers the waiver? How do the Enterprises minimize this manipulation?*

N/A.

*Question B2.5: What are the challenges associated with quality of service, enforcement and consumer protections related to non-appraiser entities providing property inspection data?*

* Competency and professionalism of the workforce
* Easy-to-use automated exterior/interior sketch tool availability
* Interested party bias
* Labor pools with no consequences
* No certification process/no standards
* Appraiser acceptance

*Question B2.6: Is there any data or evidence you could share regarding the performance of alternative appraisal solutions versus traditional appraisals?*

**Home Equity Channel Experience**

For the past five years, we have been performing alternative appraisal solutions to many of the largest home equity lenders in the US. During this period, these lenders tested and adopted new hybrid models, including bifurcated appraisals and other alternative valuation methods. An analysis of more than 14,000 bifurcated appraisals completed in live production for two lenders in some 25 states, illustrates some of the benefits of appraisal alternatives compared to traditional appraisals:

* Substantial reductions in cost and overall turn times for appraisals. In our analysis, per-unit appraisal costs for one lender declined by 48% and turn times were reduced by 44%.
* Based on lender audits, no additional risk in using the hybrids over traditional products was found if the hybrid used was (a) USPAP compliant and (b) carefully controlled and monitored as part of an overall valuation cascade.
* By integrating the hybrids into an overall valuation cascade and including an up‐front, screening of hybrid appraisal assignments, the lenders gained increased operational efficiencies. One lender saw a 37% reduction in “wasted cycle time” due to the elimination of unnecessary upgrades and wait times for multiple appraisals.

$296

$152

$0

$50

$100

$150

$200

$250

$300

$350

**Traditional**

**Hybrid**

**Traditional Exterior Appraisal vs. Hybrid Appraisal Unit Cost**

6.8

3.7

0

1

2

3

4

5

6

7

8

**Traditional**

**Hybrid**

**Traditional Exterior Appraisal vs. Hybrid Appraisal Turn Time**

(In Days)

**Value Verify Experience**

Unfortunately, just as the bifurcation experiment and test and learn process with Value Verify got fully underway, FHFA requested that the program be substantially modified. While this modification was due to many factors that made sense at the time, the fact that we could no longer use alternative workforces for the inspection meant that we had lost the most important element to reducing turn time and/or cost. Although we had limited volume experience in the bifurcation process under Value Verify, our experience did provide us and our lender partners with some valuable insights to share:

1. The Need for Better Up-front Screening for Eligible Properties

The “data and done” eligible loans did not have screening criteria outside of loan and property type characteristics. Further screening criteria such as if the estimated property value was out of range or if there were known missing or ineligible property details/history that would require a 1004P should be incorporated into the screening process. Additionally, the 1004P eligible message code should be provided.

Failure to include the further screening criteria resulted in loans being allowed to enter the Value Verify process, but such loans needed a 1004P from the initial run.

The upfront screening of all relevant eligibility criteria with the appropriate message code for a 1004P or data and done eligibility would greatly improve the process.

1. Impact of Removal of Data & Done

The main value for the borrowers and the lenders was the possibility of reducing turn times and cost by offering an inspection only (“data and done”) option. When the use of a third-party inspection option was removed, with the requirement that an appraiser does the inspection (essentially eliminating the true bifurcation process), we saw extensive negative impacts:

1. We were not successful in getting D&D over 40% which was our target goal
2. Potentially significantly longer turn time for 1004P process
3. Turn time avg for 1004: 7 days, turn time for avg VV: 8.5 days
4. Many 1004Ps ended up never being completed and were switched to 1004s due to appraiser availability for 1004P (our turn time shows how many fewer 1004Ps were completed compared to the inspections, nearly 50% converted after completing inspection).
5. Customer Impacts

Noted continued confusion with borrowers even after nearly a year of piloting trying to explain the program and why inspection and appraisal were required, sometimes requiring second inspection (either converting to 1004, missing info and appraiser went back out, etc.)

User frustrations with eligibility and ability to get D&D on optimal loans, resulted in numerous required 1004P where the appraisal came back within $15k of the estimate.

*Question B2.7: Should Enterprise type COVID-19 appraisal flexibilities be part of an updated appraisal process to address disasters and other events to lessen market impacts*

Absolutely – with some changes:

Consumer Inspections. Under controlled circumstances, when an appraisal leverages a consumer inspection, the GSEs need to find a way to rep and warrant to these loans. Otherwise, there will be limited adoption of the consumer-aided inspection in the purchase and refinance channels.

Exterior-only Appraisals. If what we are hearing is correct, then the GSEs have some encouraging data on the use of exterior-only appraisals during the pandemic. This is an excellent place to introduce the use of consumer inspections.

# Industry Considerations

## Operational Questions on Appraisal Process Improvement

*Question C1.1: What do you envision the impact of appraisal process improvements as described in this RFI to be on the appraisal industry? What impact, if any, has increasing use by the Enterprises of alternative appraisal solutions had on the availability and/or quality of traditional appraisals?*

One of the more positive impacts of appraisal process improvements has been that appraisers are becoming more comfortable with hybrids and the bifurcation approach.

We do have concerns, however, about the effect that waivers are having on the industry. The increase in waivers, while positive overall, has meant that many of the simpler properties to appraise are disappearing from appraiser assignments. What is left is a growing population of more complex and difficult properties. While it is not the FHFA’s role to determine appraisal pricing, there needs to be an industry recognition of the change to the appraisal assignment mix to ensure that appraisers are being paid customary and reasonable fees for the more complex appraisal assignments.

*Question C1.2: What would be the impact of appraisal policy and process improvements to the mid or late career appraiser? Do you believe late career appraisers would delay retirement if they could focus on specific valuation services like desktop appraisals? Or alternatively, would late career appraisers cease operations due to technology adoption challenges?*

As the number of appraisers continues to decline, the average age of appraisers continues to rise. Many late-career appraisers have not embraced much of the new technology. Some are completing appraisals the way they did 10 years ago. While there is a growing group of younger appraisers who are leveraging new technologies and processes, the industry will need to find a way to bring the rest of the workforce forward.

Again, we think the bifurcation of the appraisal, will go a long way in perhaps keeping more appraisers engaged in the business. There seem to be two types of appraisers – those that enjoy the inspection process and those that like to focus more on the analytic valuation process. Bifurcation, assuming we get the workforce part right, can encourage late-career appraisers to work more from home, using their experience to focus on the analytic aspects of the appraisal by completing desktop appraisals.

*Question C1.3: Do you believe appraisal policy and process improvements would have a positive impact on access to credit, including for rural and underserved markets by providing additional valuation services that serve the needs of these markets?*

See answer A1.2 addressing rural markets.

*Question C1.4: Is there discrimination in current collateral valuation practices? If you believe there is discrimination, describe the impact. Please provide any relevant data or analyses to support your position. Conversely, are there concerns that alternative or automated solutions could have a discriminatory impact?*

We think that engaging in alternative valuation solutions will reduce the chance of possible discriminatory practices. This is especially true for the use of alternative workforce inspections in bifurcated appraisals. By having a third party perform the inspections, the appraiser does not personally view the inside of the home or ever see the borrowers; the inspector does that. Assuming that the inspection workforce is properly vetted, trained, and certified (as discussed above), the appraiser will never know the gender or ethnicity of the property’s inhabitants. The same would be even less discriminatory for a consumer aided inspection. The best mobile inspection apps today can blur out any photographs or identifying objects that might appear in inspection photos. In addition, proper AMC quality control reviews would eliminate any such issue before the appraiser ever got the inspection report.

*Question C1.5: What are the fair housing impacts of current FHFA and Enterprise policies and procedures on appraisals and valuations, and how can these policies change to further fair housing? Please provide any relevant data or analyses.*

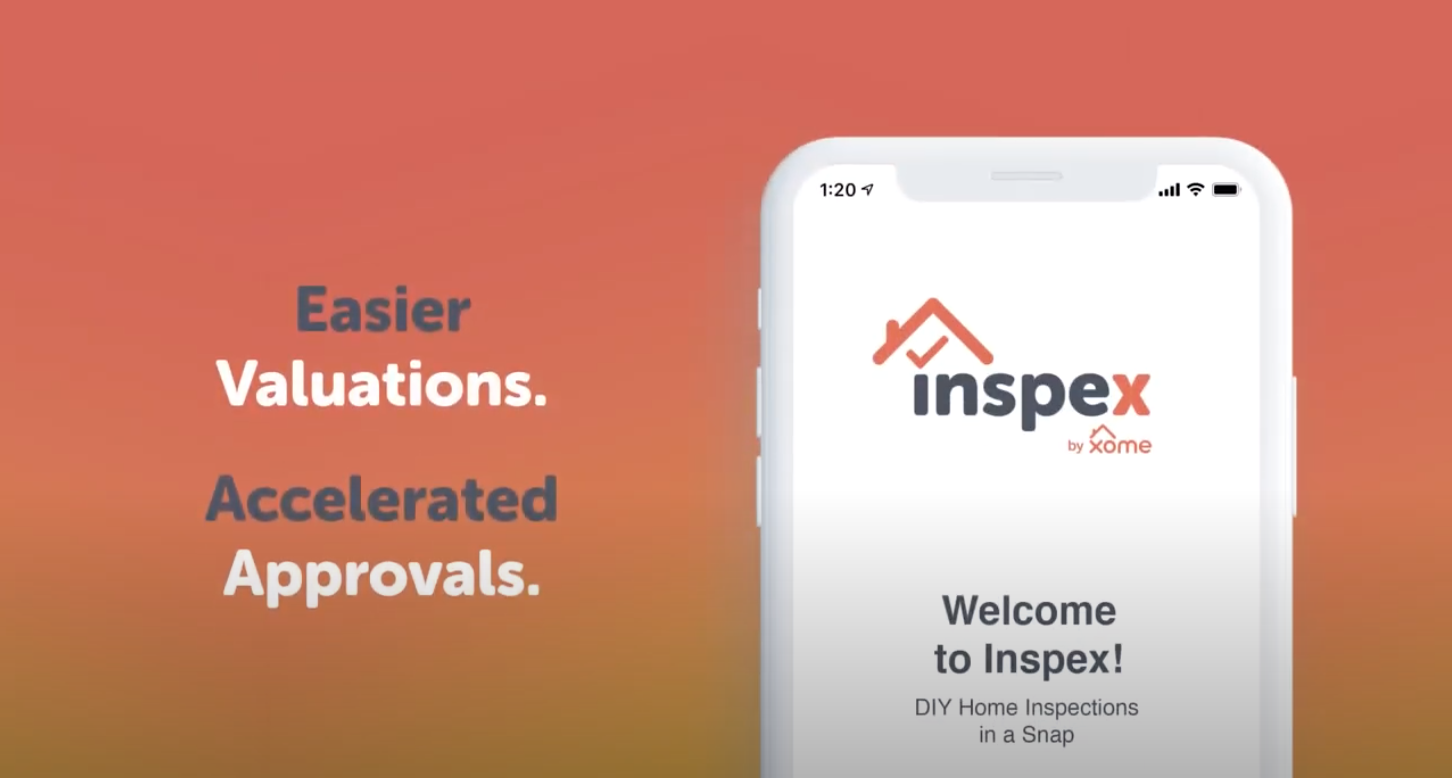
Because alternative appraisals come with faster turn times and generally lower costs, the consumer benefits. If the FHFA and the Enterprises were to change policies toward the expanded use of alternative appraisals, this would result in more efficient processes and drive down the cost of applying for a mortgage.

*Question C1.6: Do you have any additional feedback on issues and questions raised by this RFI?*

N/A. See above answers.

# Appendix

Inspex Video ([click for link](https://www.youtube.com/watch?v=03UEoDFDlUY))

[](https://www.youtube.com/watch?v=03UEoDFDlUY)

Inspex “How To” Video ([click for link](https://www.youtube.com/watch?v=E2so_d9GwJQ))

[](https://www.youtube.com/watch?v=E2so_d9GwJQ)

Inspex One Pager



