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*Comment Received From: Russell King, M.E.
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Confidentiality of HERS Provider Training Materials

I received the notice of public comment for a new HERS provider. The notice suggests to scan the docket for non confidential submissions. I reviewed the docket and there is very little information to review that is not deemed confidential. I was surprised to see that even training materials and mathematical equations were granted confidentiality. I do not believe that these meet the criteria to warrant confidentiality. Math equations are clearly already public information. Training materials based on protocols, procedures, and documents that are in the public domain cannot be considered trade secrets. It is highly unlikely that these materials could have any new or unique information in them. The only possible invention might be how the material is presented and any drawings or diagrams. These are already protected by copyright laws and therefore cannot be legally used by others to gain advantage. In fact, my desire to review the training materials stems from both from a need to ensure technical accuracy, but also from the very high occurrence of training programs using others' copyrighted materials without permission, either knowingly or unintentionally. I contend that hiding the materials behind a cloak of confidentiality may contribute to misuse of intellectual property of the exact type that the claim confidential status is seeking to protect. Since it is technically possible to make these materials available for review in a format that cannot be duplicated. I urge the CEC to reconsider the confidentiality of these documents and make them available for public review.