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To: FSIS RegulationsComments
Subject: Docket: FSIS-2006-0017

In what way has the availability of TSC services helped you with your operations?

Prior to this past year TSC was of little help at all. Since inception, they were plagued by ambiguous answers, and ESL issues. This past year it is apparent to some of us in industry that attempts have been made to improve upon their services, which in itself is a great step forward.

When you have contacted the TSC, has the response been prompt, clear, thorough, and courteous?

We have never had issues with promptness and courtesy concerns. Clarity / communications concerns are addressed in the previous response.

Is the technical guidance provided by the TSC consistent with regulations and policy as written?

When regulatory enforcement becomes consistent within Districts and Circuits, the guidance given will be more helpful. FSIS needs to address enforcement consistency in Front Line supervision and on the plant / CSI / IIC level as well as in the TSC. Likely 99% of all contact between a given Establishment and the TSC are enforcement related after the fact. TSC should be promoted to industry as proactive, as well as reactive. This will never happen as long as CSI's see the TSC as an agency that is trying to interfere with "their turf".

Is the technical guidance consistent with guidance given by FSIS inspection program personnel?

(See above comment). An additional note. Far too many Field Inspectors who have been trained in Command and Control tactics belittle and intimidate Establishments who contact TSC. Often this is taken on a personal level and not a professional one. This seems to be widespread, and is documented and verifiable.

Have you used the TSC website? If so, has it been useful?

The TSC website is a very positive tool to Industry. We are told that there are attempts to update all the information available into one easily navigated web site, which includes a searchable index of all the validation studies out there that may be useful to small and very small Establishments. This should be the number one priority of services provided by the TSC.

If you have contacted the TSC multiple times regarding the same topic, has the guidance been consistent over time?

Usually there is. However like any other source of information, there are some folks at TSC who

provide better service than others. Local Establishments call each other with the “best” contacts they have there. We shouldn’t have to do that.

Have you had difficulty in reaching the TSC staff?

In our experience, we have gotten through immediately, or with a brief hold time.

Thanks for the opportunity to comment.



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