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Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
300 12th Street, SW
Room 102 Cotton Annex
Washington, DC 20250

**RE: Docket No. FSIS 2006-0017
Technical Service Center Operations**

The American Association of Meat Processors (AAMP) is pleased to submit the following comments on Docket No. FSIS 2006-0017, "Technical Service Center Operations."

AAMP is an international organization whose members include meat and poultry processors, slaughterers, caterers, food service companies, wholesalers, retailers, suppliers, and consultants to the meat and poultry industry. There are 33 state, regional, and provincial associations of meat processors that are also affiliated with AAMP. Majority of our members are small and very small businesses, most of them family-owned and operated.

The Food Safety and Inspection Service's (FSIS) Technical Service Center (TSC) in Omaha, Nebraska has proved to be a great resource for both FSIS employees and industry alike. AAMP utilizes the TSC frequently and encourages our members to do the same. The Tech Center is a quick and easy-to-use resource for inspection personnel, as well as industry members when questions arise or when clarification is needed. It is important for this resource to be available and FSIS is to be commended for taking action to improve the TSC's usefulness. AAMP and its members have gotten a variety of responses from the TSC, some being very prompt, clear, thorough, and overall helpful, while others were not. The problem ultimately lies in the differences between Tech Center employees, training levels, and their ability to communicate with small and very small plant operators. The Agency, through its new outreach initiative, has tried to improve the relationship with small processors and the Tech Center by offering a more streamlined process to receive assistance. This process seems to be working well and AAMP believes that small plants will continue to take advantage of the services that the TSC has to offer.

One of the biggest concerns AAMP has about the Technical Service Center is that responses are not always consistent. In order to avoid this, AAMP tries to contact specific TSC employees when seeking information. Since processors do not always have this luxury when they call or

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email the Tech Center, inconsistencies arise. It may be appropriate to designate specific staff to cover questions related to certain topics of expertise, enabling processors to receive the correct answer from the proper person. FSIS has been trying to develop a database of commonly asked questions and their respective answers to alleviate inconsistencies. If implemented successfully, this solution should help the TSC avoid the problems that arise from inconsistent answers. While the Agency has begun posting this “database” of questions and answers online, FSIS must continuously keep the site updated. Currently, the only information available is related to FSIS Notices. AAMP believes it would be helpful to better organize the Tech Center’s website and include additional scenarios or situations that have prompted questions. This would give operators and inspection personnel better web resources to access prior to contacting the TSC, while providing staff with quick resources to refer callers to online.

Another concern AAMP has is regarding the type of answers received from the Tech Center. From our experience, the guidance provided by the TSC typically reiterates the regulation or Agency policy to which the question is related. This practice helps to ensure that the guidance is consistent with written regulations, but when the regulations are not explained properly, callers end up frustrated. Small plant operators need to have the regulations explained to them as they relate to their question. It is not effective to simply regurgitate the regulations; nor does it improve the understanding of them. The telephone method of contacting the Tech Center offers callers a better opportunity to explain their question or situation, but ultimately lacks the ability to have an answer in writing. TSC patrons should have the opportunity to receive the answer to their question in writing from the very same person who answered the question on the phone in the first place. This option provides reassurance for operators and inspection personnel that the information they are receiving is correct, while at the same time gives them the ability to refer back to the document if the same question arises in the future. Providing written responses would ultimately increase the Tech Center’s accountability for the responses they provide, making it even more important to be consistent and correct. This practice would also eliminate many miscommunications that occur when information is not documented.

Most small processors would benefit from having the Tech Center assist with providing and explaining proper scientific documentation for HACCP plans. It is almost useless for most small plant operators to be told there are specific studies available for scientific documentation, when they do not have the ability to access them. If the document is found, in many cases the processor does not know what it actually means. Many small processors are not educated in the science fields, but instead received their education through working hands-on in the plant and lack the ability to decipher a scientific document without help from a professional. This is a prime opportunity for the TSC to improve its usefulness.

FSIS has the ability to collect a wealth of information from the Tech Center. If particular regulations or policies are the source of questions, it is the obligation of the Agency to take action to provide additional guidance on that topic. Additionally, if questions received by the TSC reflect that incorrect policy interpretations are occurring in a localized district or area of the country, FSIS is able to pinpoint where the problem lies and resolve it quickly. The Agency must encourage open lines of communication between inspection personnel, plant management, and the Tech Center as many discrepancies can be resolved quickly and easily by utilizing the services of the TSC.

In one particular situation, when resolution was not reached through phone calls and emails, the Director of the TSC suggested that a conference call be held with the plant in order to provide

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clarification for the situation. A conference call was held between AAMP, the TSC, and the operator who was questioning a series of NRs in his plant. This format was very helpful because it gave the operator the opportunity to speak to the Tech Center while having a third party available. The conference call answered the questions the plant had and provided a positive learning experience for all parties. This type of interaction should be encouraged, especially for inspection personnel and operators who are having discrepancies or need questions answered. It certainly was a beneficial experience and AAMP is hopeful that the Tech Center will continue offering improved assistance opportunities for small plants!

We encourage FSIS to continue to review the effectiveness of and make improvements to the Technical Service Center in Omaha, Nebraska. This is of the utmost importance in making the resource as valuable as possible. The changes made thus far to provide better outreach for small and very small plants have enhanced their overall experience with Tech Center services. It is critical for the Agency to provide educational resources and assistance for small and very small establishments who are undoubtedly at a disadvantage in those specific areas when compared to large plants. Thank you for the opportunity to share our experiences and suggestions for improving the FSIS Technical Service Center.

Sincerely,



Andrea H. Brown
Director of Legislative and Regulatory Affairs

cc: Jason Jennings, AAMP President