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-Important Dates-

49th
Management Conference
March 2006
The Drake Hotel
Chicago, IL

64th
Annual Convention
September 2006
Four Seasons Hualalai
Hawaii



NORTH AMERICAN MEAT PROCESSORS ASSOCIATION

FSIS Docket Clerk
Via electronic mail

August 30, 2006

To Whom It May Concern:

The North American Meat Processors Association (NAMP) would like to submit the following comments in regards to Docket number FSIS-2006-0017, Technical Service Center Operations.

NAMP is a non-profit trade association representing small to mid-sized meat and poultry plants across the United States and Canada. NAMP members are committed to the highest standards in food safety and quality. As small and mid-sized processors, NAMP members utilize the help and advice of the Technical Service Center (TSC) on a regular basis and find the TSC to be a useful resource.

NAMP would like to submit the following comments to the questions posed by FSIS:

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

Since the implementation of HACCP, the TSC has helped provide clarification as to what the regulatory requirements are for processing facilities. This has helped answer general questions and resolve disputes between plants and the local inspection force. The TSC is used to give detailed interpretation of regulations as they apply to specific operations. The TSC has also been helpful in answering questions from NAMP members in disputes involving the labeling staff.

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

Yes, the responses are generally prompt, clear, thorough, and courteous. Sometimes the TSC staff seems hesitant to give answers to questions that are in "grey" areas. On rare occasion, TSC personnel seem to have an "us verses them" attitude. Overall, the customer service at the TSC is very good.

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

The guidance given is generally consistent with the regulations, although on occasion a different answers are given by different personnel. FSIS regulations leave some room for interpretation, and the TSC personnel may interpret certain parts of the regulations differently. The TSC should make consistency in answers a priority.



August 30, 2006

TSC Comments

Page 2

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

The technical guidance is often contrary to that of FSIS inspection program personnel. However, using the TSC to help during a disagreement with inspection personnel is one of the most useful functions of the TSC. Having a call between the establishment, inspection personnel, and the TSC is an excellent tool for resolving disputes. NAMP members have reported instances when inspection personnel have not wanted to participate in such a call, so it may be necessary to formalize instructions to the field regarding the use of the TSC in this manner. Also, it has been reported that in some instances the guidance of the TSC was not accepted by the inspection personnel. These cases are not common, but some guidance may be necessary in order for the industry to get the best possible results from utilizing the TSC.

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

The IKE scenarios on the TSC website are very useful. To make the TSC website more useful, FSIS should expand Q&As. Questions that come into the TSC should be documented in writing and put into a searchable database. In addition, contact information should be given for TSC personnel. It would be extremely helpful to list the names, phone extensions, and email addresses of current staff members.

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

The TSC has improved in this area dramatically. It helps when a TSC staff member who is not as familiar with a subject will have another staff member answer the question.

How could the TSC improve its services?

In addition to the comments relating to the website, the TSC can improve its services by being better trained on new directives, notices, and regulations prior to their release. It has been the experience of NAMP members that the TSC sometimes does not have the information they need to answer questions regarding new requirements until after the directives, notices, or regulations are released.

Have you had difficulty in reaching the TSC staff?

The TSC staff is available and easy to reach.

What recommendations do you have for TSC in communicating information to you?

The TSC should update the Q&As on the website on a frequent basis based on recent calls. In addition, TSC staff members should follow up every call with an email to the caller when an email address is



August 30, 2006

TSC Comments

Page 3

provided. This email should also go into TSC records. This will help the industry to accurately capture the guidance of the TSC and will also help facilitate expanding the Q&A section of the website.

What specifically could the TSC do to improve its services to small businesses?

The suggestions in the above questions will help small businesses. In addition, a general understanding and education among the TSC staff on the differences between small and large plants, and the flexibility allowed in the regulations, will help staff members answer questions accurately. The ability of small plants to use the TSC resources when needed to dispute decisions made by in-plant inspectors is very valuable. It would also be valuable to have TSC staff present during local or regional trainings and workshops. This would help to improve consistency in the interpretation of regulations or new information, as well as provide correlation between districts.

The TSC has been a useful tool since its inception, and we hope that the TSC will continue to operate and improve its services. NAMP appreciates the opportunity to comment on this important service at FSIS.

Sincerely,

Ann Rasor
Director of Scientific and Regulatory Affairs