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August 30, 2006

Program Evaluation and Improvement Staff
Food Safety and Inspection Service
U.S. Department of Agriculture
Room 3833 South Building
1400 Independence Avenue, SW
Washington, DC 20250-3700

Re: Docket No. FSIS-20006-0017 TECHNICAL SERVICE CENTER OPERATIONS

Dear Sir or Madam:

The National Turkey Federation (NTF) appreciates the opportunity to submit comments to the above-mentioned Notice and request for comments. NTF represents nearly 100 percent of all turkey processors, growers, and allied industries. NTF is an advocate for all segments of the U.S. turkey industry, providing services and conducting activities, which increase demand for its members' products and protect and enhance the ability to effectively and profitably provide wholesome, high quality, nutritious turkey products. It is the only association representing the turkey industry exclusively.

The turkey industry shares the National Advisory Committee on Meat and Poultry Inspection's (NACMPI) support in the continuation of the Technical Service Center's operation and its continued assistance to not only the FSIS workforce but to industry as well. The TSC is especially important to the small and very small establishments who need assistance in policy changes to current food safety system requirements.

To this point, NTF is happy to provide the following answers to the questions posed in the *Federal Register* notice:

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

Overall, turkey industry believes that the TSC has been able to provide them real-time answers regarding proper interpretations of regulations. The TSC has for the most part provided information, which has assisted both the turkey industry as well

as FSIS inspection program personnel in what applicable regulatory stands are and how they should be met.

However, the industry also agrees that answers provided by the TSC have become somewhat vague over time since its inception. Moreover, many questions now seem to be referred to Washington, DC whereas in the past, the TSC would provide input. One suggested improvement would be that the TSC provide specific answers to questions as many times the call to TSC is the result of a point of difference between an FSIS inspector and the establishment and could involve disposition for product that may be on hold.

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

The industry agrees that the TSC staff are always courteous and, the majority of times, prompt as well. This is almost always related to whether the question being asked is clearly defined by regulation. If not, many times answers will take longer and the answer may also be “unclear.” It is believed that the TSC is sometimes reluctant to provide specific guidance to industry after a local FSIS inspection program person has taken a certain position, which may not be the same as what the TSC would recommend. This leads to many answers from the TSC to follow the appeal process. In some of these situations, though, industry is only looking for a better understanding of the regulation and is not requesting that an FSIS inspector’s decision be overturned.

3. Is the technical guidance provided by the TSC consistent with regulations and policy as written? Is the technical guidance consistent with guidance given by FSIS inspection program personnel?

For the most part, the turkey industry agrees that technical guidance provided by the TSC has always been consistent with regulations and, for the most part, with policy. However, sometimes policy issues pose problems, as policies are more of a viewpoint or opinion. Seldom does the guidance provided by the TSC agree with that of the FSIS inspection program personnel.

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

While most of the industry has used the TSC Web site and likes to receive an email to use as supporting documentation, the site is difficult to navigate when looking for answers to specific questions. The IKE scenarios have provided useful information to both inspection and industry personnel.

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

While most responses are generally consistent, many questions/request have been answered differently at one time or another. It is a belief that better correlation between the staff officers would aid not only the industry but also the TSC because this inconsistency in responses has been used by FSIS inspection personnel to discredit industry-initiated TSC contact in the past. Moreover, many times the inconsistencies in the TSC responses are with responses to the same question received from Washington, DC. Recently it seems that TSC personnel have consulted among their peers to reach a consensus of opinion if necessary.

6. How could the TSC improve its services?

It is our believe that joint calls with the FSIS inspection personnel, establishment management, and the TSC will help, as everyone will hear the same message. Joint calls should be supported and encouraged by the FSIS and the questions and answers documented. This and better correlation between the staff members so that responses are the same will also address the majority of concerns.

The TSC can also improve its services by making a staff officer available to take calls during TSC meetings. There have been times when no one was available when the TSC staff had meetings.

7. Have you had difficulty in reaching the TSC staff?

As mentioned above, the only time there have been issues with reaching TSC staff was when meetings were in progress. In addition, it should be noted that since the implementation of the new automated telephone system that reaching staff members is more difficult. The intent of the new system is recognized; however, its is believed it is ineffective and just slows the process down

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

The turkey industry believes the TSC has much to offer and have many suggestions on how the TSC can share that information. Suggestions include a better search engine for the Web site to allow searches to be done using a question format. Also, we would like to see any verbal communication followed up with written confirmation.

Another suggestion is that the TSC provide email alerts for new postings to their Web site as FSIS does on the main Web site. In addition, it would be helpful if new TSC information could be posted in the Constituent Update. It may also be helpful if the

TSC offers classes on some regulations and what the agency's interpretation is and how to comply.

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

The turkey industry feels that using the above suggestions will address needs for both large and small businesses and do not believe there is a need for "different" services. The regional information meetings around the country should include TSC information and support services.

Again, thank you for the opportunity to comment to this request. We are happy to provide input to help further improve the services and guidance available from the FSIS TSC. If we can be of further assistance, please feel free to contact us.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Rybolt', with a long horizontal flourish extending to the right.

Michael Rybolt, Ph.D.
Manager, Scientific and Regulatory Affairs