

# National Meat Association

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October 9, 2007

Desk Officer for Agriculture,  
Office of Information and Regulatory Affairs,  
Office of Management and Budget,  
New Executive Office Building,  
725 17<sup>th</sup> Street, NW., Room 725  
Washington D.C. 20503

Re: Docket No. AMS-LS-07-0106; LS-07-01  
RIN 0581-AC67  
*Federal Register*, Wednesday, August 8, 2007  
Vol. 72, No. 152  
Pages 44671-44722

Gentlemen:

On behalf of the members of National Meat Association (NMA), we respectfully submit the following comments in response to the *Federal Register* Proposed Rule entitled, "Livestock Mandatory Reporting; Reestablishment and Revision of the Reporting Regulation for Swine, Cattle, Lamb, and Boxed Beef."

Organized in 1946, NMA represents the interests of meat packers and processors throughout the United States. With approximately 300 general member companies, all of which could feel the ramifications of the "livestock mandatory reporting; reestablishment and revision of the reporting regulation for swine, cattle, lamb, and boxed beef," NMA has a great interest in this *Federal Register* Proposed Rule.

The National Meat Association supports most of the proposed changes in the regulation. Although practically all of the changes will result in a cost to reprogram current systems, several of the changes will eliminate the requirement to submit and retain records of information that is of little or no value. Further, minimizing the submission of information should make the USDA audit process more efficient and lessen the burden on packers.

**Fr: National Meat Association  
To: Desk Officer for Agriculture,  
Office of Information and Regulatory Affairs,  
Office of Management and Budget**

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## **Recordkeeping**

NMA supports the change that eliminates the requirement on lamb importers to report the time of day of a sale. Though NMA agrees with this change, NMA feels the Agency should be reasonable with regards to record retention. We feel records should not be retained in excess of what is needed for the department to run its program.

## **Conclusion**

Though NMA agrees with most of the changes in the Proposed Rule, NMA feels the agency needs to take a look at record retention requirements, which have not been addressed in the Proposed Rule. Consistent with the Agency's past practices on voluntary market reporting, NMA expects the Agency to work closely with the industry and consider our input as new or modified reports are developed. Further, we stress the importance of allowing appropriate time for implementation and appropriate beta testing of changes to assure a smooth transition.

Thank you for providing this opportunity to comment.

Sincerely,

Rosemary Mucklow  
Director Emeritus

Ken Mastracchio  
Associate Director Regulatory

Satbir Bal  
Regulatory Analyst