FSIS Responses to
Comments from the U.S. Meat Export Federation

1. We request FSIS provide assurances the PHIS Export system will have reliable operating capabilities and include a 24 hour help desk as many companies have offices in all six U.S. time zones and may have individuals working in the system at all times of the day that may need technical assistance with this system.

The Food Safety and Inspection Service (FSIS) of the U.S. Department of Agriculture (USDA) will offer assistance to domestic users of the Public Health Information System (PHIS) via askFSIS. Users with questions about how to use PHIS should contact FSIS' Office of Policy and Program Development (OPPD) via askFSIS as indicated on the FSIS website (http://www.fsis.usda.gov) or by telephone (1-800-233-3935).

Once PHIS is implemented, OPPD will be responding to PHIS-related askFSIS and phone inquiries from 6 a.m. to 11 p.m. Central Time on Monday through Friday (except for Federal holidays). Export-related questions will continue to be handled by FSIS' Export Programs staff (importexport@fsis.usda.gov) and by askFSIS during normal business hours.

The askFSIS system also offers a database with answers to frequently asked questions regarding PHIS. The askFSIS database, which is available 24 hours a day, 7 days per week, is accessible on the FSIS website at http://askfsis.custhelp.com/cgi-bin/askfsis.cfg/php/enduser/std_adp.php?p_faqid=802&p_created=1191437083&p_topview=1.

For questions or issues related to eAuthentication (eAuth), customers may contact the USDA eAuth Service Desk at eAuthHelpDesk@ftc.usda.gov or 1-800-457-3642. The USDA Service Desk will be staffed from 6 a.m. to 6 p.m. Central Time Monday through Friday (except for Federal holidays). To create a Level 2 Customer eAuthentication account, the first step is for customers to sign up via https://eauth.sc.egov.usda.gov/eAuth/selfRegistration/selfRegLevel2Step1.jsp. Once customers have completed the first step and responded to the confirmation e-mail, the second step is to make an appointment with a Local Registration Authority (LRA) at a USDA Service Center using the Service Center Locator at http://offices.sc.egov.usda.gov/locator/app?type=lra.

2. The industry is very interested in how FSIS will provide appropriate and adequate security to the system so that exporter users' computer systems are not at jeopardy to unlawful intrusions from outside computer users.

Connecting to PHIS does not increase or decrease the security of export users' computer equipment. FSIS will not require any software to be installed on their computers, and all

access to PHIS will be through a secure mechanism, much like access to online banking sites.

PHIS will give establishments and import/export brokers an important role in that security. PHIS will ensure that each user's access to data is appropriately defined by that person's role in doing business through PHIS. PHIS will provide access to data that are appropriate only for that specific establishment or broker.

FSIS is using USDA's eAuthentication (eAuth) system and an invitation key as the primary method for managing security for each individual who uses PHIS. The invitation key, which will be mailed to each establishment, will be specific to a person—such as the establishment's General Manager or Vice President—whom the company has designated for access to the system.

3. It is unclear to us to what extent there is a paperless link to several of our trading partners. FSIS has indicted that they are working with 10 countries: Canada, Mexico, Japan, Korea, Russia, China, Hong Kong, Taiwan, Egypt and Ukraine, but we have not been provided any evidence that the government officials in these counties will accept the PHIS Export Certificate in an electronic form. We feel the industry should be better informed on the status of the trading partners' acceptance of the PHIS Export system.

FSIS will gain more detailed information about the capability of individual trading partners to receive electronic certificates as PHIS export certification information is provided to them. Paper certificates issued by PHIS will be considered the default means of certification unless agreement is reached with the importing country for one of the alternative means (e.g., electronically) of receiving certificates.

FSIS is taking every opportunity to educate U.S. trading partners about PHIS.   FSIS' Office of International Affairs will send detailed information about PHIS export certification to the importing countries at least 90 days prior to implementation.

4. We request FSIS be more open and provide the industry the exact dates of implementation of the four modules of PHIS. The members of USMEF feel all four modules should be implemented at the same time.

Due to logistical considerations, it will be necessary to implement the domestic module in four phases—for one quarter of all circuits in each phase—tentatively scheduled to begin on April 11, 2011. The import module will be implemented for all users simultaneously in the summer of 2011. The export module, which will involve approximately 120 countries to which the United States exports products, will be implemented after deployment of the domestic module is completed.

The fourth module—predictive analytics—implements functionality for the module being deployed in the timeframes identified above. Thus, predictive analytics for the domestic

functionality will be operational when the domestic module is implemented, and the same will be true for the import and export modules. The predictive analytics module will be under continual refinement as data are analyzed and utilized according to the *FSIS Strategic Data Analysis Plan for Domestic Inspection* published in September 2010.

5. The industry appreciates the overview of the PHIS Export module through the webinars and a working meeting. However, we request FSIS provide the industry a detailed live demonstration of the system and allow industry users to enter data and experience the various functions of the system.

Although a live demonstration is not feasible due to security concerns, FSIS will offer an interactive PHIS webinar prior to implementation. This webinar will provide potential users with step-by-step instruction in the system's use. PHIS training materials will also be available on FSIS' PHIS website (http://www.fsis.usda.gov/phis).

6. FSIS has indicated they will allow a business to government computer interface to allow exporters that request many export certificates per week. This is of upmost importance to the success of this program as this allows these companies to streamline their business practices for greater efficacy and accuracy. On the other hand, the web based system will be used by a large number of exporters that request export certificates on a less frequent basis. In addition the PHIS export system must be flexible to also accommodate paper documents to assist smaller operators that only request export certificates on a minimum basis or do not have computer capabilities. We ask FSIS to be more diligent in working with large companies in the process of interfacing the business computer to the FSIS computer. In all cases (business to government computer interface, web based system and the paper program) we ask FSIS provide complete educational materials to the industry so training programs can be developed to train the industry users of the systems.

If a small business does not have computer access or an Internet connection, it will not be required to use PHIS. Such businesses will continue to receive paper copies of documents and will be able to provide written communications in a paper format.

Businesses that do not wish to establish an eAuthentication account will be asked to send documents, including export applications and product lists, to FSIS' Office of International Affairs (OIA) in Washington, D.C. OIA will enter the information in PHIS, and when an application is approved, in-plant personnel will be able to print the export certificate for the company.

Materials on the process and requirements for connecting a business computer system directly to PHIS are being developed and will be provided through the Office of International Affairs once they are available for distribution.

In addition, a comprehensive PHIS user guide is currently being developed for all establishments using PHIS. The guide will be available on FSIS's PHIS website (http://www.fsis.usda.gov/phis) prior to PHIS implementation.

7. In many cases the PHIS Export module will be primarily executed out of accounting/billing departments of companies of which many are located at a corporate office. The PHIS domestic module will function out of a specific FSIS Establishment (plant). How will FSIS accommodate eAuthentication and other functions in the export and domestic modules when the primary functions of each are in separate locations?

All PHIS users will be invited to establish an eAuthentication (eAuth) account, which will provide them with access to the system and will enable them to take advantage of PHIS' many benefits regardless of their location. PHIS does not have the capability to combine individual eAuth accounts under one corporate eAuth account. Further information on PHIS' structure and capabilities is available on FSIS' PHIS website (http://www.fsis.usda.gov/phis).