

PUBLIC SUBMISSION

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Docket: FSIS-2025-0246

Notice of Request to Renew an Approved Information Collection: Specified Risk Materials

Comment On: FSIS-2025-0246-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Specified Risk Materials

Document: FSIS-2025-0246-0002

Comment from ENTERED INTO THE RECORD FOR OMB OIRA OIG AND GAO REVIEW ON MARCH 16, 2026 BY OBELISK T4ECH SYSTEMS INC.

Submitter Information

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Organization: ENTERED INTO THE RECORD FOR OMB OIRA OIG AND GAO REVIEW ON MARCH 16, 2026 BY OBELISK T4ECH SYSTEMS INC.

General Comment

FSIS-2025-0246 (SRM Cattle — 123,916 hrs):

FSIS-2025-0246 | OMB 0583-0129 | James Hunter Poole, CEO, Obelisk Tech Systems | CAGE: 9S0L8 | HUBZone | Thomasville, Thomas County, Georgia — active cattle-producing region. 123,916 annual burden hours across 3,512 establishments = 35 hours per establishment annually. FSIS presents no breakdown between written procedure development, daily monitoring records, corrective action documentation, and vertebral column transfer records — each with materially different burden characteristics. 303 annual responses per respondent is essentially daily recordkeeping — FSIS inspectors are already present at official establishments and enter inspection findings into PHIS. FSIS has not demonstrated why establishment daily SRM records provide information not already in FSIS's own PHIS inspection system. DUPLICATION with PHIS = PRA-prohibited. Kill floor management systems generate electronic SRM documentation automatically — LIMS integration would reduce manual recordkeeping burden by 70-80%. No cost claim excludes \$3.07M-\$5.53M annual industry QA labor cost. RFA analysis required for small rural Southwest Georgia cattle processors. Document attached.

Attachments

FSIS_0246_SRM_Cattle