

Public Comment — FSIS-2025-0246

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Re: Specified Risk Materials (SRM) in Cattle — Renewal

Agency: Food Safety and Inspection Service, USDA

Submitted: March 16, 2026

Submitted by:

James Hunter Poole, Executive Chairman & CEO, Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | HUBZone-Certified | ITAR-Registered | CMMC L2

BIS SNAP-R CIN: S745686 | Thomasville, Thomas County, Georgia | Delaware C-Corporation

14-Patent Portfolio: Cybersecurity, Quantum Communications, Autonomous Systems

SEC EDGAR CIK: 0002090527 | Thomas County Republican Party Chairman

Obelisk Tech Systems Inc. submits this comment as a HUBZone-certified small business in Thomas County, Georgia — an agricultural community in Southwest Georgia's cattle-producing region. These comments address substantive PRA deficiencies across burden estimation, technology modernization, duplication, and small business impact.

I. Burden Hours — 123,916 Hours at 303 Responses/Respondent

FSIS estimates 123,916 total annual burden hours across 3,512 respondents at 303 annual responses per respondent. This translates to approximately 35 burden hours per respondent annually — nearly a full work week dedicated solely to SRM recordkeeping. FSIS has not disclosed: the breakdown between written procedure development (one-time), daily monitoring records (recurring), corrective action documentation (event-driven), and vertebral column transfer documentation (shipment-specific). Each of these components has materially different burden characteristics. A single flat average across all respondent types — from large federally inspected slaughter facilities with dedicated compliance staff to small rural processors with limited administrative capacity — is statistically invalid. FSIS must produce a disaggregated burden estimate by establishment size and record type before OMB renewal.

- 303 annual responses per respondent = daily records plus periodic documentation — not a single annual submission
- 35 hours annually per respondent understates burden for small rural establishments without dedicated compliance staff
- Daily monitoring recordkeeping burden must be estimated separately from written procedure development and corrective action documentation

II. Technology Failure — Paper Recordkeeping for Daily Slaughter Operations

FSIS requires daily records documenting SRM removal, segregation, and disposition monitoring. Modern slaughter facility management systems — including HACCP record management software, electronic kill floor documentation systems, and real-time production monitoring platforms — generate structured electronic production data as a byproduct of normal operations. FSIS has not evaluated whether electronic SRM monitoring integrated with existing kill floor management systems could reduce or eliminate the manual daily recordkeeping burden. FSIS should issue an RFI to slaughter facility management system vendors on API-based SRM monitoring data integration before renewing a manual daily recordkeeping requirement.

III. Duplication — Existing FSIS Inspection Records

FSIS inspectors are present at official slaughter establishments and document inspection findings — including observations of SRM removal and handling — in FSIS's own inspection records systems (PHIS — Public Health Information System). Establishment SRM records and FSIS inspection records cover overlapping activities at the same facilities on the same days. FSIS has not demonstrated that establishment daily SRM records provide information not already captured in FSIS inspector observations entered into PHIS. A data crosswalk between PHIS inspection data and establishment SRM recordkeeping requirements should be required before renewal.

IV. Small Business Impact — Rural Southwest Georgia Cattle Processors

Thomas County and surrounding Southwest Georgia counties host cattle operations and small federally inspected processing facilities that bear SRM recordkeeping burdens with limited administrative staff. A small rural processor conducting 20–50 cattle slaughters per day maintains 303 annual SRM records with the same per-record requirements as a large commercial slaughter facility conducting 5,000 head per day. The per-establishment administrative burden is identical regardless of throughput — a structural burden asymmetry that disproportionately affects small rural processors. FSIS must produce a Regulatory Flexibility Act analysis and evaluate throughput-scaled recordkeeping alternatives for small-volume establishments.

V. Cost Reality — Daily Compliance Staff Time

FSIS states no cost beyond time. For official slaughter establishments, SRM daily recordkeeping requires: trained QA/compliance staff maintaining daily logs, supervisor review and sign-off on monitoring records, corrective action documentation when deviations occur, and vertebral column transfer documentation for inter-establishment shipments. At \$25–45/hour for slaughter facility QA staff, 35 annual hours per establishment = \$875–\$1,575 in direct annual labor cost per establishment x 3,512 establishments = \$3.07M–\$5.53M total industry annual compliance cost. None of this appears in FSIS's "no cost" claim.

VI. COTS Solution and Recordkeeping Burden

Commercial kill floor management platforms with real-time SRM monitoring documentation capability, electronic daily record generation, and FSIS PHIS integration are available. These platforms could reduce manual daily recordkeeping burden by 70–80% for equipped establishments. FSIS should pilot electronic SRM monitoring integration with at least two commercial kill floor management systems before renewing the current manual daily recordkeeping requirement. Additionally, the PRA definition of burden at 44 U.S.C. 3502(2) requires recordkeeping obligation burden to be separately estimated — FSIS's single aggregate estimate does not satisfy this requirement for a collection that is fundamentally a daily recordkeeping program.

Requested: FSIS must: (1) disaggregate burden by record type and establishment size; (2) conduct PHIS inspection data crosswalk; (3) produce RFA small business analysis; (4) pilot electronic SRM monitoring integration; (5) include realistic labor cost estimates; (6) produce standalone recordkeeping burden estimate.