

NASS-2026-0002 | Comment 1 of 5 — Burden & Lifecycle

Docket: NASS-2026-0002 | OMB 0535-0220

Re: Cotton Ginning Survey

Agency: USDA / National Agricultural Statistics Service

Submitted: March 16, 2026

Submitted by:

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

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

Thomasville, Thomas County, Georgia | 14-Patent Portfolio: Cybersecurity, Quantum Comms, Autonomous Systems

I. Burden Hours — Uninterpretable Estimate

NASS estimates 10–15 minutes per response across ~600 active cotton gins for 1,300 annual hours. This estimate is uninterpretable: NASS does not disclose how many survey cycles constitute this total (August–May = multiple contacts), whether 10–15 min reflects mid-season vs. end-of-season reconciliation (substantially more complex), or how burden varies by gin size and management system capability.

- NASS must disclose survey cycle count and per-cycle burden estimates separately
- End-of-season reconciliation surveys require substantially more than 15 minutes

II. Lifecycle — Season-Long Burden

Cotton ginning season spans August–May. Active gins face recurring NASS contacts across this 10-month period. Cumulative seasonal burden per respondent gin: initial survey + mid-season reports + end-of-season reconciliation + county-of-origin tracking + NASS field representative verification contacts = 60–120 minutes annually. This is 4x–8x the 10–15 minute single-contact estimate. NASS must estimate and disclose full seasonal lifecycle burden per gin.

Requested: Disclose survey cycle count; produce cumulative seasonal burden estimate per gin.

NASS-2026-0002 | Comment 2 of 5 — Methodology, Cost & Economic Impact

Docket: NASS-2026-0002 | OMB 0535-0220

Re: Cotton Ginning Survey

Agency: USDA / National Agricultural Statistics Service

Submitted: March 16, 2026

Submitted by:

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

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

Thomasville, Thomas County, Georgia | 14-Patent Portfolio: Cybersecurity, Quantum Comms, Autonomous Systems

III. Methodology — No Gin-Type Disaggregation

A single 10–15 minute estimate across 600 gins with widely varying operational complexity is statistically meaningless. Small family-operated gins completing hand-written forms have categorically different burden than large commercial gins with dedicated administrative staff and digital management systems. NASS must produce disaggregated burden estimates by gin size (bales/season), management system type, and survey cycle.

IV. Cost Reality — Peak Season Interruption

NASS states no cost beyond time. For cotton gins at peak throughput during harvest, a 10–15 minute survey interruption represents real operational cost: quality control attention diverted from active ginning operations, potential throughput reduction, and downstream farmer delivery schedule impacts. These peak-season operational costs are excluded from NASS's estimate.

V. Economic Impact — Thomas County Regional Stakes

Obelisk Tech Systems is headquartered in Thomas County, Georgia — an active agricultural community in a major cotton-producing region of Southwest Georgia. The submitter holds generational family land in Thomas County. Corrected season-long burden (60–120 min annually) across 600 gins = 36,000–72,000 actual annual burden hours vs. the stated 1,300 hours. This 27x to 55x understatement has direct regional economic impact on Southwest Georgia cotton operations.

Requested: Disaggregated burden by gin type and survey cycle; peak-season operational cost estimate.

NASS-2026-0002 | Comment 3 of 5 — Practical Utility, Duplication & Statutory

Docket: NASS-2026-0002 | OMB 0535-0220

Re: Cotton Ginning Survey

Agency: USDA / National Agricultural Statistics Service

Submitted: March 16, 2026

Submitted by:

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

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

Thomasville, Thomas County, Georgia | 14-Patent Portfolio: Cybersecurity, Quantum Comms, Autonomous Systems

VI. Practical Utility — Automated Gin Systems Already Have This Data

Cotton ginning data — bales ginned, lint produced, cottonseed — is generated automatically by gin management systems as a byproduct of normal operations. Manual transcription to a NASS form serves no purpose that API data feeds cannot replace for gin operators with automated systems. NASS must demonstrate what proportion of 600 respondents lack automated gin management data and limit manual collection to that subset only.

VII. Duplication — FSA, RMA, AMS Overlap

Cotton production data is reported to multiple USDA agencies: FSA through commodity program participation and CCC-576 documentation, RMA through crop insurance APH production history, and AMS through cotton classing and grading records. Thomas County, Georgia cotton producers routinely submit overlapping data to FSA, RMA, and AMS in addition to NASS. No crosswalk has been conducted.

- USDA internal cotton data fragmentation across NASS, FSA, RMA, and AMS is PRA-prohibited duplication

VIII. Cross-Agency — USDA Cotton Data Architecture

Within USDA, cotton production data is collected by NASS, ERS, FSA, RMA, and AMS with minimal integration. A unified USDA cotton data API enabling single-entry reporting with automated cross-agency distribution should be required before NASS renews this manual collection.

IX. Statutory — County-of-Origin Tracking Scope

The county-of-origin bale tracking component extends beyond production forecasting into detailed supply chain traceability that may serve commercial market analysis purposes beyond NASS's core 7 U.S.C. 2204(a) statistical mandate. NASS must justify this element separately.

Requested: Conduct FSA/RMA/AMS data crosswalk; develop unified USDA cotton API; justify county-of-origin tracking against statistical authority.

NASS-2026-0002 | Comment 4 of 5 — Technology, Interoperability & COTS

Docket: NASS-2026-0002 | OMB 0535-0220

Re: Cotton Ginning Survey

Agency: USDA / National Agricultural Statistics Service

Submitted: March 16, 2026

Submitted by:

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

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

Thomasville, Thomas County, Georgia | 14-Patent Portfolio: Cybersecurity, Quantum Comms, Autonomous Systems

X. Technology Failure — No Gin Management System Integration

Major gin management platforms generate structured electronic production data in real time. NASS has implemented no API integration with any of these platforms despite their direct relevance to Cotton Ginning Survey requirements. Manual survey in 2026 for data generated automatically is indefensible for a federal statistical agency.

- Gin management system API integration would reduce Cotton Ginning Survey burden to near zero for equipped respondents
- NASS should issue a public RFI to gin management system vendors on API integration capability

XI. Interoperability — NASS Disconnected from FSA and AMS

NASS Cotton Ginning data feeds into USDA crop reports but has zero interoperability with FSA commodity program records, AMS classing data, or RMA crop insurance history. Gins must report overlapping production data through four separate agency channels with zero cross-validation. A unified USDA cotton data API would enable single-entry reporting with automated cross-agency distribution.

XII. Pilot Testing

NASS has not disclosed whether it has piloted electronic submission alternatives for the Cotton Ginning Survey. Other NASS programs have implemented electronic submission with documented 30–50% burden reduction. NASS must complete an electronic submission pilot before renewing manual collection methodology.

XIII. COTS Solution

Agricultural data integration platforms with gin management system connectivity and federal reporting API are commercially available. A gin-side API integration would automatically extract production data, validate against NASS format requirements, encrypt and transmit to NASS, and generate submission confirmation — reducing burden from 10–15 min per cycle to 1–2 min for exception review. U.S. small agricultural technology firms can deliver this.

Requested: Issue RFI to gin management system vendors; pilot API integration with 10–15 gins; develop electronic submission portal for non-GMS gins.

NASS-2026-0002 | Comment 5 of 5 — Small Business, Security, Quality, Drag & Recordkeeping

Docket: NASS-2026-0002 | OMB 0535-0220

Re: Cotton Ginning Survey

Agency: USDA / National Agricultural Statistics Service

Submitted: March 16, 2026

Submitted by:

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

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

Thomasville, Thomas County, Georgia | 14-Patent Portfolio: Cybersecurity, Quantum Comms, Autonomous Systems

XIV. Small Business / Small Independent Gins

Small independent gin operators — lacking dedicated administrative staff, digital management systems, and multiple commodity program reporting experience — fall at the upper end of the 15-minute burden range. Survey burden that discourages small gin participation reduces statistical validity for the small-gin sector. NASS must produce a Regulatory Flexibility Act analysis and develop a streamlined pathway for small independent gins.

XV. Thomas County Regional Standing

Thomas County, Georgia is an active agricultural community in a major cotton-producing region. As a HUBZone-certified small business headquartered in Thomas County with generational family land in the region, Obelisk Tech Systems has direct standing to represent Southwest Georgia's agricultural sector interest in reducing unnecessary reporting burden on cotton ginning operations.

XVI. Data Security — Confidentiality Architecture

Cotton gin production data is commercially sensitive. NASS is authorized under 7 U.S.C. 2276 to maintain strict confidentiality for non-aggregated respondent data, but has not disclosed how gin survey data is stored, who has access, what access controls apply, or what breach notification procedures exist. For gins with competitive confidentiality interests, this disclosure is essential.

XVII. Data Quality — Peak Season Fatigue

Gin operators contacted during peak ginning season — managing maximum operational complexity — produce systematically less accurate survey data: rounded estimates, deferred verification, and placeholder responses. NASS should develop a tiered approach: rapid digital entry of key metrics during peak season, comprehensive contact during off-peak periods.

XVIII. Operational Drag

Peak-season survey contacts interrupt gin supervisor attention from active quality control. NASS should implement advance scheduling allowing gin operators to designate preferred lower-throughput survey windows.

XIX–XX. Multi-Agency Pattern & Recordkeeping

NASS surveys across cotton, objective yield, and other commodity programs exhibit consistent manual collection where automated data exists — a systemic USDA modernization failure requiring OIRA-level direction. Additionally, gins maintain NASS-verifiable production records creating ongoing recordkeeping burden entirely excluded from the 10–15 minute estimate and required to be disclosed under 44 U.S.C. 3502(2).

Requested: RFA small gin analysis; 7 U.S.C. 2276 security architecture disclosure; gin management API pilot; OIRA-directed NASS modernization initiative.