

[Back to Document Comments \(/document/APHIS-2025-0704-0001/comment\)](#)

Share ▾

 PUBLIC SUBMISSION

Comment from ENTERED ON MARCH 10, 2026 INTO THE RECORD BY SMALL BUSINESS DEFENSE CONTRACTOR OBELISK TECH SYSTEMS INC. BY JAMES POOLE

Posted by the **Animal and Plant Health Inspection Service** on Mar 10, 2026

[Docket \(/docket/APHIS-2025-0704\)](#) / [Document \(APHIS-2025-0704-0001\) \(/document/APHIS-2025-0704-0001\)](#) / [Comment](#)

Comment

ENTERED ON MARCH 10, 2026 INTO THE RECORD BY JAMES H. POOLE THE CEO OF OBELISK TECH SYSTEMS INC. A SMALL BUSINESS DEFENSE CONTRACTOR IN RURAL FEMA DISASTER ZONE TRACT

Attachments 20

 APHIS_01_PRA_Core

 Download ▾

Give Feedback

 APHIS_02_PracticalUtility

 Download ▾



DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-01 OF 20
TITLE	Paperwork Reduction Act Core Objection: APHIS 30,930-Hour Burden Estimate Understates True Small Farm Cost — Burden Increase Is Unjustified and OMB Must Reject Revision to 0579-0090
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

This comment formally objects to the Animal and Plant Health Inspection Service's proposed revision to and extension of approval of OMB Control Number 0579-0090, covering Specimen Submission forms for livestock disease surveillance. APHIS discloses a total annual burden of 30,930 hours across 95,060 responses from 14,860 respondents. This estimate materially understates the true burden on small rural farms and rural veterinarians, and the burden increase driving the revision — attributed to an increase in the number of respondents — has never been adequately justified.

The PRA requires agencies to accurately estimate the full burden of information collections, including all time necessary to gather, maintain, and submit the required information. 44 U.S.C. Section 3506(c)(2)(A). APHIS's estimate of 0.325 hours per response — approximately 19.5 minutes — reflects the time to complete the form itself. It does not count the time to: collect specimens from animals; prepare specimens for transport; coordinate with laboratory submission requirements; document chain of custody; follow up on laboratory results; or manage the administrative burden of multiple concurrent submissions during disease events. For small rural farms, the true per-response burden is conservatively two to four times APHIS's disclosed estimate.

Obelisk Tech Systems Inc. operates in Thomasville, Thomas County, Georgia — a rural agricultural community where livestock operations are a significant economic sector. Thomas County is directly affected by APHIS disease surveillance requirements. The company and its principal, James Hunter Poole, have direct community standing to challenge the accuracy of APHIS's burden estimate for rural livestock operations in Southwest Georgia.

SECTION II — QUANTIFIED ANALYSIS

A. The True Per-Response Burden

A realistic estimate of the per-response burden for a small rural livestock farm includes: specimen collection from animals — estimated 20 to 45 minutes depending on animal type; specimen preparation for transport — estimated 15 to 30 minutes; completing the Specimen Submission form — estimated 15 to 20 minutes (APHIS's estimate covers only this step); coordinating with a licensed veterinarian for certain specimens — estimated 30 to 60 minutes if coordination is required; transporting specimens to submission point — estimated 30 to 120 minutes for rural farms without local laboratory access; and follow-up documentation — estimated 15 to 30 minutes. Total per-response true burden: estimated 1.5 to 5 hours per response versus APHIS's disclosed 0.325 hours.

B. The Burden Increase Is Unjustified

APHIS states that the revision reflects an increase in the number of respondents, responses, and total burden hours. This increase has not been adequately justified. APHIS has not explained: why the number of respondents has increased; whether this reflects an expansion of surveillance program scope; whether the additional respondents are small farms that face higher per-response burdens; or whether the increased burden could be achieved through less burdensome means. An unexplained burden increase is an independent PRA deficiency.

SECTION III — DEMANDED ACTIONS

Demanded Action 1

OMB shall reject the proposed revision to OMB Control Number 0579-0090 until APHIS submits a corrected burden estimate reflecting the true per-response burden for small rural livestock farms — including specimen collection, preparation, transport, and follow-up time — and provides an adequate explanation for the increase in respondents and total burden hours. Deadline: Immediate rejection.

Demanded Action 2

APHIS shall conduct and publish a burden analysis based on time-use surveys of actual small rural farm respondents, measuring the full time investment required to complete a Specimen Submission from specimen collection through form submission. Deadline: 90 days from this comment.

Demanded Action 3

APHIS shall provide a written explanation of the reason for the increase in respondents, responses, and burden hours, with specific identification of whether the increase reflects an expansion of surveillance scope and, if so, the statutory authority and cost-benefit justification for that expansion. Deadline: 90 days from this comment.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
44 U.S.C. Section 3501 et seq.	Paperwork Reduction Act	Accurate burden disclosure required — 0.325 hour per response estimate excludes majority of actual farm burden
44 U.S.C. Section 3506(c)(2)(A)	PRA Burden Estimation	Full burden including specimen collection, preparation, and transport must be counted — APHIS counts only form completion
44 U.S.C. Section 3507(d)	OMB Review Requirement	Burden increase requires OMB approval with adequate justification — justification not provided
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	Unjustified burden increase is arbitrary — State Farm requires reasoned explanation
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Judicial Precedent	Agency must examine relevant data — true small farm burden is relevant data not examined
5 U.S.C. Sections 601-612	Regulatory Flexibility Act	Small rural farms are most burdened respondents — IRFA based on false estimate is deficient
7 U.S.C. Section 8301 et seq.	Animal Health Protection Act	Statutory authority for surveillance does not authorize unlimited burden expansion — scope must be justified
E.O. 12866	OIRA Cost-Benefit Review	True burden increase must be weighed against disease surveillance benefit — analysis never done

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

APHIS_03_RFA_SmallFarm

 Download ▾



APHIS_04_RuralGeorgia_Standing

 Download ▾



APHIS_05_StateAuthority

 Download ▾



APHIS_06_Automation

 Download ▾



APHIS_07_APA_ArbitraryCapricious (1)

 Download ▾



APHIS_07_APA_ArbitraryCapricious

 Download ▾



APHIS_08_OMB_OIRA_Rejection

 Download ▾



APHIS_09_AHPAScope

 Download ▾

Give Feedback



APHIS_10_CattleFeverTickAudit



Download ▼



APHIS_11_GAO_Audit



Download ▼



APHIS_12_Congressional_Notice



Download ▼



APHIS_13_CFOAct



Download ▼



APHIS_14_Privacy



Download ▼



APHIS_15_Duplication



Download ▼



APHIS_16_OIG_Referral



Download ▼



APHIS_17_EO12866



Download ▼

Give Feedback



APHIS_18_RuralEconomicImpact



Download ▾



APHIS_19_TechModernization



Download ▾

Comment ID

APHIS-2025-0704-0004



Tracking Number

mmk-awie-curs

Comment Details

Submitter Info

Document Subtype

Public Comment

Received Date

Mar 10, 2026

Give Feedback



Your Voice in Federal Decision Making

About Bulk Data Download Agencies Learn Reports FAQ Commenting Guidance

(/about) (/bulkdownload) (/agencies) (/learn) (/dotreports) (/faq) (/commenting-guidance)

[Privacy & Security Notice \(/privacy-notice\)](/privacy-notice) | [User Notice \(/user-notice\)](/user-notice) |
[Accessibility Statement \(/accessibility\)](/accessibility) | [API Requests \(https://open.gsa.gov/api/regulationsgov/\)](https://open.gsa.gov/api/regulationsgov/) |
[FOIA \(https://www.gsa.gov/reference/freedom-of-information-act-foia\)](https://www.gsa.gov/reference/freedom-of-information-act-foia)

[Support \(/support\)](/support)

[Give Feedback](#)

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-02 OF 20
TITLE	Practical Utility Challenge: APHIS Must Justify Each Form Element — Livestock Disease Surveillance Does Not Require Every Data Point Currently Collected
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

The PRA requires that information collected by APHIS have practical utility — meaning it must be necessary for the proper performance of APHIS's disease surveillance function. 44 U.S.C. Section 3506(c)(1). APHIS has never demonstrated, element by element, that every data field on the Specimen Submission form and its continuation sheet is necessary for effective disease surveillance. The Specimen Submission form collects extensive data about the submitter, the animal source, the specimen type, and the suspected disease — not all of which is necessary for every surveillance submission.

Effective disease surveillance requires: identification of the animal species and geographic source; the specimen type and collection date; the suspected disease or purpose of testing; and the submitting veterinarian or institution for results reporting. Additional data elements — detailed herd owner information, animal identification systems, production classification data — serve program management rather than surveillance functions and could be collected through less burdensome post-result processes. APHIS has never published an element-by-element necessity analysis.

SECTION II — DEMANDED ACTIONS

Demanded Action 1

APHIS shall conduct and publish an element-by-element necessity analysis of every data field on the Specimen Submission form, demonstrating the specific disease surveillance function served by each element and why that function cannot be served by less burdensome means. Deadline: 90 days from this comment.

Demanded Action 2

APHIS shall remove from the Specimen Submission form all data elements that serve program management rather than immediate disease surveillance functions, and shall collect program management data through separate, less burdensome post-result processes. Deadline: Prior to next renewal.

Demanded Action 3

OMB shall condition any renewal of OMB Control Number 0579-0090 on APHIS completing the element-by-element necessity analysis demanded herein. Deadline: Immediate OMB condition.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
44 U.S.C. Section 3506(c)(1)	PRA Practical Utility Requirement	Each data element must be necessary for agency function — APHIS has never conducted element-by-element analysis
44 U.S.C. Section 3508	PRA Duplication Prohibition	Data available from state systems must not be collected again federally — duplication documented in APHIS-15
7 U.S.C. Section 8301 et seq.	Animal Health Protection Act	Statutory authority is for disease surveillance — data collection beyond surveillance necessity exceeds this authority
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	Collecting unnecessary data is arbitrary — no rational basis for form elements beyond surveillance necessity
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Judicial Precedent	Necessity of each form element is relevant data that must be examined — APHIS has not examined it
5 U.S.C. Sections 601-612	Regulatory Flexibility Act	Unnecessary data collection disproportionately burdens small rural farms without equivalent support staff
E.O. 12866	OIRA Cost-Benefit Review	Cost of unnecessary data collection must be weighed against surveillance benefit — never done
44 U.S.C. Section 3501 et seq.	Paperwork Reduction Act	Practical utility is threshold PRA requirement — collection fails if any element lacks demonstrated necessity

APA Section 706 rights reserved.

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-03 OF 20
TITLE	RFA Small Farm Impact: 14,860 Respondents Are Predominantly Small Rural Farmers and Veterinarians — IRFA Is Inadequate and Must Be Revised
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

The Regulatory Flexibility Act requires APHIS to analyze the impact of the Specimen Submission information collection on small entities — specifically the small rural farms, small veterinary practices, and small research institutions that constitute the overwhelming majority of the 14,860 annual respondents. APHIS's IRFA for this collection is inadequate because it applies a uniform 0.325-hour per-response burden estimate to all respondents regardless of size, geographic location, or operational complexity — failing to recognize the systematic burden asymmetry between large institutional respondents (universities, large laboratories, major veterinary practices) and small rural farm operations.

A large veterinary diagnostic laboratory that submits hundreds of specimens per year to NVSL has established submission procedures, trained staff, and electronic submission infrastructure. The per-response burden for such an institution is approximately consistent with APHIS's 0.325-hour estimate. A small rural livestock farm in Thomas County, Georgia that submits a handful of specimens per year in response to a suspected disease event has none of this infrastructure. The per-response burden for this farm — including specimen collection, veterinarian coordination, rural transport, and form completion — is estimated at 1.5 to 5 hours. The IRFA's failure to distinguish these categories is a fundamental RFA deficiency.

SECTION II — DEMANDED ACTIONS

Demanded Action 1

APHIS shall prepare and publish a revised IRFA that specifically analyzes the per-entity burden for small rural farms versus large institutional respondents, using survey data from each category. Deadline: 90 days from this comment.

Demanded Action 2

APHIS shall adopt a simplified submission pathway for small rural farm respondents — a streamlined Specimen Submission form with fewer fields that captures surveillance-essential data without the full burden of the standard form. Deadline: Prior to next renewal.

Demanded Action 3

APHIS shall consult with the SBA Office of Advocacy, the National Farmers Union, and the American Farm Bureau Federation before finalizing this revision, and shall include the record of that consultation in the docket. Deadline: Prior to renewal approval.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
5 U.S.C. Sections 601-612	Regulatory Flexibility Act	Small rural farms are most burdened respondents — IRFA must analyze their burden separately from institutional respondents
5 U.S.C. Section 603	RFA IRFA Requirement	IRFA must analyze small entity impact — uniform burden estimate across all respondents is insufficient
5 U.S.C. Section 604(a)(5)	RFA Least Burdensome Alternative	Simplified form for small rural farms is least burdensome alternative — RFA requires its adoption
Pub. L. 104-121 (SBREFA)	Small Business RFA Enforcement	SBA Office of Advocacy must be consulted — small rural farms qualify as small entities
44 U.S.C. Section 3501 et seq.	Paperwork Reduction Act	True small farm burden never disclosed — PRA and RFA deficiencies compound each other
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	IRFA deficiency is independent APA ground — renewal without adequate small entity analysis is arbitrary
7 U.S.C. Section 8301 et seq.	Animal Health Protection Act	Statute does not authorize imposing disproportionate burdens on small farms — RFA compliance required
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Judicial Precedent	Small farm burden data is relevant data that must be examined — APHIS has not examined it

APA Section 706 rights reserved.

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-04 OF 20
TITLE	Rural Georgia Standing: Thomas County Georgia Livestock Operations Are Directly Affected — Rural High-Poverty Farm Community Impact Analysis Required
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

This comment establishes the standing of James Hunter Poole and Obelisk Tech Systems Inc. to comment on this collection on behalf of rural livestock operators in Thomas County, Georgia, and demands that APHIS conduct a specific impact analysis for rural high-poverty agricultural communities in the Deep South — communities that face heightened burdens from federal specimen submission requirements due to geographic isolation, limited veterinary infrastructure, and economic constraints.

Thomas County, Georgia is a rural high-poverty census tract with approximately 23 percent poverty and 14 percent bachelor's degree attainment. The county's agricultural sector includes beef cattle, poultry, hogs, and other livestock operations that are subject to APHIS disease surveillance requirements. Thomas County's rural geography — with limited local veterinary laboratory infrastructure and significant driving distances to NVSL-connected facilities — creates specimen submission burdens that are dramatically higher than the national average APHIS uses in its burden estimate.

The practical consequence of APHIS's uniform burden estimate is that the compliance costs borne by a Thomas County cattle farmer are systematically undercounted relative to those borne by a farmer near a major veterinary diagnostic laboratory. This geographic burden asymmetry has real economic consequences for rural Southwest Georgia livestock operations that are already operating on thin margins in a high-poverty community.

SECTION II — QUANTIFIED ANALYSIS

A. Southwest Georgia Veterinary Infrastructure Gap

The nearest NVSL-connected veterinary diagnostic laboratory to Thomasville, Georgia is the Georgia Diagnostic and Investigative Laboratories facility in Tifton, Georgia — approximately 45 miles away. For a Thomas County livestock farmer who must transport specimens to this facility, the transport burden alone adds approximately 1.5 to 2.5 hours per submission round trip. APHIS's 0.325-hour estimate does not include any transport time. For Southwest Georgia farmers, transport alone increases the true per-response burden by 460 to 770 percent above APHIS's estimate.

B. Economic Impact on High-Poverty Rural Communities

For a Thomas County livestock farmer with a median farm income at or below the county median household income of approximately \$35,000, the time cost of a single disease surveillance submission — including specimen collection, veterinarian coordination, transport, and form completion — at a realistic 2 to 5 hours per response represents a significant opportunity cost. At an agricultural labor opportunity cost of \$15 to \$25 per hour, a single submission costs \$30 to \$125 in time — a burden that is proportionately far higher for a small rural farm than for a large commercial operation or institutional respondent.

SECTION III — DEMANDED ACTIONS

Demanded Action 1

APHIS shall conduct and publish a rural geographic burden analysis that accounts for specimen transport time from farms in rural counties without local NVSL-connected laboratory access — specifically including Thomas County, Georgia and comparable Southwest Georgia counties. Deadline: 90 days from this comment.

Demanded Action 2

APHIS shall establish a mobile specimen collection and transport service for rural high-poverty counties without local laboratory access, funded by APHIS rather than borne by individual farmers, as a burden reduction measure. Deadline: Next USDA budget cycle.

Demanded Action 3

APHIS shall include Thomas County, Georgia as a case study community in all future burden analyses for the Specimen Submission collection. Deadline: Incorporated in revised burden estimate.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
44 U.S.C. Section 3501 et seq.	Paperwork Reduction Act	Geographic transport burden not counted — material understatement for rural counties without local lab access
5 U.S.C. Sections 601-612	Regulatory Flexibility Act	Rural geographic burden asymmetry is a small entity impact — RFA requires analysis
7 U.S.C. Section 8301 et seq.	Animal Health Protection Act	Statute authorizes surveillance but not imposition of disproportionate geographic burdens on rural farmers
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	Geographic burden asymmetry is relevant data — failure to examine it is arbitrary
E.O. 12866	OIRA Cost-Benefit Review	Rural geographic burden must be included in cost-benefit analysis — significant cost never quantified
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Judicial Precedent	Transport burden data is relevant data that must be examined — APHIS has not examined it
42 U.S.C. Section 5170	Stafford Act	Disaster surveillance events impose emergency-level burdens on rural farms — federal relief should cover specimen transport
IRC Section 1400Z-2	Qualified Opportunity Zones	Thomas County is a rural high-poverty community — federal agricultural programs must account for QOZ community economic fragility

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-04 OF 20
TITLE	Rural Georgia Standing: Thomas County Georgia Livestock Operations Are Directly Affected — Rural High-Poverty Farm Community Impact Analysis Required
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

This comment establishes the standing of James Hunter Poole and Obelisk Tech Systems Inc. to comment on this collection on behalf of rural livestock operators in Thomas County, Georgia, and demands that APHIS conduct a specific impact analysis for rural high-poverty agricultural communities in the Deep South — communities that face heightened burdens from federal specimen submission requirements due to geographic isolation, limited veterinary infrastructure, and economic constraints.

Thomas County, Georgia is a rural high-poverty census tract with approximately 23 percent poverty and 14 percent bachelor's degree attainment. The county's agricultural sector includes beef cattle, poultry, hogs, and other livestock operations that are subject to APHIS disease surveillance requirements. Thomas County's rural geography — with limited local veterinary laboratory infrastructure and significant driving distances to NVSL-connected facilities — creates specimen submission burdens that are dramatically higher than the national average APHIS uses in its burden estimate.

The practical consequence of APHIS's uniform burden estimate is that the compliance costs borne by a Thomas County cattle farmer are systematically undercounted relative to those borne by a farmer near a major veterinary diagnostic laboratory. This geographic burden asymmetry has real economic consequences for rural Southwest Georgia livestock operations that are already operating on thin margins in a high-poverty community.

SECTION II — QUANTIFIED ANALYSIS

A. Southwest Georgia Veterinary Infrastructure Gap

The nearest NVSL-connected veterinary diagnostic laboratory to Thomasville, Georgia is the Georgia Diagnostic and Investigative Laboratories facility in Tifton, Georgia — approximately 45 miles away. For a Thomas County livestock farmer who must transport specimens to this facility, the transport burden alone adds approximately 1.5 to 2.5 hours per submission round trip. APHIS's 0.325-hour estimate does not include any transport time. For Southwest Georgia farmers, transport alone increases the true per-response burden by 460 to 770 percent above APHIS's estimate.

B. Economic Impact on High-Poverty Rural Communities

For a Thomas County livestock farmer with a median farm income at or below the county median household income of approximately \$35,000, the time cost of a single disease surveillance submission — including specimen collection, veterinarian coordination, transport, and form completion — at a realistic 2 to 5 hours per response represents a significant opportunity cost. At an agricultural labor opportunity cost of \$15 to \$25 per hour, a single submission costs \$30 to \$125 in time — a burden that is proportionately far higher for a small rural farm than for a large commercial operation or institutional respondent.

SECTION III — DEMANDED ACTIONS

Demanded Action 1

APHIS shall conduct and publish a rural geographic burden analysis that accounts for specimen transport time from farms in rural counties without local NVSL-connected laboratory access — specifically including Thomas County, Georgia and comparable Southwest Georgia counties. Deadline: 90 days from this comment.

Demanded Action 2

APHIS shall establish a mobile specimen collection and transport service for rural high-poverty counties without local laboratory access, funded by APHIS rather than borne by individual farmers, as a burden reduction measure. Deadline: Next USDA budget cycle.

Demanded Action 3

APHIS shall include Thomas County, Georgia as a case study community in all future burden analyses for the Specimen Submission collection. Deadline: Incorporated in revised burden estimate.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
44 U.S.C. Section 3501 et seq.	Paperwork Reduction Act	Geographic transport burden not counted — material understatement for rural counties without local lab access
5 U.S.C. Sections 601-612	Regulatory Flexibility Act	Rural geographic burden asymmetry is a small entity impact — RFA requires analysis
7 U.S.C. Section 8301 et seq.	Animal Health Protection Act	Statute authorizes surveillance but not imposition of disproportionate geographic burdens on rural farmers
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	Geographic burden asymmetry is relevant data — failure to examine it is arbitrary
E.O. 12866	OIRA Cost-Benefit Review	Rural geographic burden must be included in cost-benefit analysis — significant cost never quantified
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Judicial Precedent	Transport burden data is relevant data that must be examined — APHIS has not examined it
42 U.S.C. Section 5170	Stafford Act	Disaster surveillance events impose emergency-level burdens on rural farms — federal relief should cover specimen transport
IRC Section 1400Z-2	Qualified Opportunity Zones	Thomas County is a rural high-poverty community — federal agricultural programs must account for QOZ community economic fragility

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-05 OF 20
TITLE	State Veterinarian Authority: States Already Conduct Superior Disease Surveillance — Federal Duplication of State Systems Is Waste — State-Led Model Must Be Evaluated
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

This comment challenges the expansion of the APHIS Specimen Submission information collection on the ground that state veterinary diagnostic systems — specifically the network of state veterinary diagnostic laboratories, state animal health programs, and cooperative state-federal surveillance programs — already collect substantially equivalent data at the state level. Federal duplication of data already collected by state systems is waste under the PRA's anti-duplication principle and the CFO Act's financial efficiency mandate.

Georgia operates the Georgia Diagnostic and Investigative Laboratories (GDIAL) network, which collects specimen submission data from Georgia livestock operations as part of the state's animal health surveillance program. The data collected by GDIAL is substantially equivalent to the data collected on APHIS's Specimen Submission form for the same specimens. When a Georgia livestock farmer submits a specimen through the GDIAL network, the specimen data is already collected at the state level. APHIS's additional federal collection of the same data — in many cases for the same specimens — is duplicative under PRA Section 3508.

SECTION II — DEMANDED ACTIONS

Demanded Action 1

APHIS shall conduct and publish a duplication analysis identifying all Specimen Submission data elements that are also collected by state veterinary diagnostic laboratory systems in the states with APHIS cooperative agreements, and shall eliminate all federally duplicative data collection where state data is adequate for surveillance purposes. Deadline: 90 days from this comment.

Demanded Action 2

APHIS shall evaluate a state-led disease surveillance model under which state veterinary diagnostic laboratories serve as the primary data collection mechanism for all routine surveillance submissions, with federal APHIS collection limited to specimens requiring NVSL-level analysis not available at state laboratories. Deadline: 180 days from this comment.

Demanded Action 3

APHIS shall negotiate data sharing agreements with state veterinary diagnostic laboratory networks to obtain state-collected submission data electronically, eliminating the need for separate federal form submissions for specimens already reported to state systems. Deadline: 360 days from this comment.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
44 U.S.C. Section 3508	PRA Duplication Prohibition	Federal collection of data already in state systems is duplicative — APHIS must eliminate duplicative collection
7 U.S.C. Section 8301 et seq.	Animal Health Protection Act	Federal-state cooperative surveillance framework envisioned by statute — federal duplication of state data contradicts this framework
E.O. 13132	Federalism	State authority over agricultural programs within state borders — APHIS expansion should respect state surveillance primacy
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	Duplicating state data collection without justification is arbitrary — state-led alternative never evaluated
Pub. L. 101-576	Chief Financial Officers Act	Federal duplication of state surveillance systems is financial inefficiency — CFO Act requires evaluation
44 U.S.C. Section 3501 et seq.	Paperwork Reduction Act	Anti-duplication principle is core PRA mandate — state-federal data sharing eliminates burden at zero surveillance cost
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Judicial Precedent	State-led alternative is relevant alternative that must be evaluated — APHIS has not evaluated it
E.O. 12866	OIRA Cost-Benefit Review	State-led surveillance model cost-benefit never analyzed — would show dramatic burden reduction at equivalent surveillance value

APA Section 706 rights reserved.

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-06 OF 20
TITLE	Automation Demand: Electronic Submission Alternatives Exist and Are Not Being Required — PRA Section 3506(c)(3) Violated — APHIS Must Mandate Electronic Submission Before Renewal
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

The PRA requires agencies to use automated collection techniques and other forms of information technology to minimize the burden of information collections. 44 U.S.C. Section 3506(c)(3). Electronic specimen submission systems exist and are in use by some NVSL submitters. Paper-based or PDF-based Specimen Submission forms remain available and widely used by rural small farm submitters. APHIS has not required electronic submission, has not provided universal access to electronic submission systems for small rural farms, and has not assessed the burden reduction that electronic submission would produce. This is a PRA Section 3506(c)(3) violation.

Electronic submission of Specimen Submission data would: eliminate paper form completion time; enable automated data validation reducing submission errors; allow pre-population of returning submitter data; integrate directly with NVSL laboratory information management systems; and enable real-time submission tracking for submitters. The burden reduction from universal electronic submission is estimated at 30 to 50 percent of the form completion component of the total burden. APHIS has never analyzed this alternative.

SECTION II — DEMANDED ACTIONS

Demanded Action 1

APHIS shall assess and publish the burden reduction potential of universal electronic submission for the Specimen Submission collection, including the cost of deploying accessible electronic submission systems to rural small farm submitters. Deadline: 90 days from this comment.

Demanded Action 2

APHIS shall deploy a mobile-accessible electronic Specimen Submission system — usable on a smartphone — that enables rural small farm submitters to complete submissions electronically without internet connectivity requirements. Deadline: Prior to next renewal.

Demanded Action 3

OMB shall condition any renewal of OMB Control Number 0579-0090 on APHIS implementing electronic submission capabilities accessible to all categories of submitters, including rural small farms without broadband internet access. Deadline: Immediate OMB condition.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
44 U.S.C. Section 3506(c)(3)	PRA Automation Requirement	APHIS must use electronic submission — failure to require it is PRA violation
44 U.S.C. Section 3501 et seq.	Paperwork Reduction Act	Automation is mandatory burden minimization tool — APHIS failure to implement electronic submission violates PRA core requirement
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	Failure to evaluate electronic submission alternative is arbitrary — State Farm requires examination of available alternatives
E.O. 13960	AI in Government	Federal AI and automation policy requires agencies to use technology to improve service delivery — APHIS application process should comply
E.O. 12866	OIRA Cost-Benefit Review	30 to 50 percent burden reduction from electronic submission — significant cost saving never analyzed
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Judicial Precedent	Electronic submission alternative is relevant data that must be examined — APHIS has not examined it
Infrastructure Investment and Jobs Act	Rural Broadband	Rural broadband investment must be paired with electronic submission systems accessible to rural farms
5 U.S.C. Sections 601-612	Regulatory Flexibility Act	Electronic submission most benefits small rural farms — RFA requires consideration of technology alternatives

APA Section 706 rights reserved.

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-07 OF 20
TITLE	APA Section 706 Objection: Burden Increase Approved Without Adequate Explanation — Why Are More Respondents Needed? State Farm Demands Reasoned Answer
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

APHIS states in the Federal Register notice that the revision to OMB Control Number 0579-0090 reflects an increase in the number of respondents, responses, and total burden hours. This statement does not constitute the reasoned explanation that *Motor Vehicle Manufacturers Association v. State Farm Mutual Automobile Insurance Co.*, 463 U.S. 29 (1983), requires. Under *State Farm*, an agency must examine the relevant data and articulate a satisfactory explanation for its action including a rational connection between the facts found and the choice made. A bare statement that the number of respondents has increased is not a satisfactory explanation for why that increase is appropriate, why a larger surveillance program is needed, or why the burden of the increase should fall on private submitters rather than being absorbed by federal or state resources.

The questions APHIS must answer — and has not — include: What disease events or surveillance gaps drove the decision to expand the respondent pool? What is the statutory authority for expanding the surveillance program scope? Has APHIS conducted a cost-benefit analysis comparing the disease surveillance value of the expanded program to the additional burden it imposes on rural farmers and veterinarians? Has APHIS evaluated whether the surveillance expansion could be achieved through less burdensome means — electronic submission, state-level data sharing, targeted surveillance rather than broad respondent expansion?

SECTION II — DEMANDED ACTIONS

Demanded Action 1

APHIS shall publish a written explanation of the reasons for the increase in respondents, responses, and total burden hours — specifically identifying the disease surveillance gap or program expansion that drives the increase, the statutory authority for the expanded scope, and the cost-benefit analysis supporting the decision to expand rather than achieve equivalent surveillance through less burdensome means. Deadline: 90 days from this comment.

Demanded Action 2

APHIS shall evaluate whether the surveillance expansion that drives the burden increase can be achieved through electronic data sharing with state veterinary diagnostic systems — as demanded in Documents APHIS-05 and APHIS-06 — rather than through expansion of the federal Specimen Submission respondent pool. Deadline: 90 days from this comment.

Demanded Action 3

OMB shall reject the proposed revision until APHIS provides the written explanation demanded herein and demonstrates that the burden increase is the least burdensome means of achieving the identified surveillance objective. Deadline: Immediate OMB condition.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	Burden increase without adequate explanation is arbitrary — State Farm requires rational connection between facts and choice
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Master Precedent	Bare statement of respondent increase is not satisfactory explanation — reasoned analysis of why increase is needed required
44 U.S.C. Section 3507(d)	OMB Review Requirement	Burden increase requires OMB approval with adequate justification — justification not provided
44 U.S.C. Section 3501 et seq.	Paperwork Reduction Act	PRA requires agencies to use minimum information necessary — burden increase must be justified as minimum necessary
7 U.S.C. Section 8301 et seq.	Animal Health Protection Act	Statutory authority for surveillance does not authorize unexplained expansion — statutory basis for increase must be identified
E.O. 12866	OIRA Cost-Benefit Review	Disease surveillance value of expanded program must be weighed against additional burden — analysis never done
5 U.S.C. Sections 601-612	Regulatory Flexibility Act	Burden increase falls disproportionately on small rural farms — RFA requires explanation of why less burdensome alternative not adopted
Pub. L. 101-576	Chief Financial Officers Act	Unexplained program expansion consuming additional private sector resources without demonstrated return is CFO Act concern

APA Section 706 rights reserved.

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-08 OF 20
TITLE	OMB and OIRA Rejection Request: OMB Control Number 0579-0090 Revision Must Be Rejected Until Burden Increase Is Justified and True Small Farm Burden Is Disclosed
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

This document constitutes a formal request to OMB and OIRA to reject the proposed revision to OMB Control Number 0579-0090 on the grounds that: the burden estimate of 0.325 hours per response materially understates the true small rural farm burden; the increase in respondents, responses, and total burden hours has not been adequately explained or justified; the anti-duplication requirement of PRA Section 3508 has not been satisfied; and the automation assessment required by PRA Section 3506(c)(3) has not been conducted. On each of these independent grounds, OMB cannot lawfully approve this revision.

OMB's statutory obligation under 44 U.S.C. Section 3507(a)(2) is to determine whether the collection of information is necessary for the proper performance of APHIS's functions. OMB cannot make this determination on the basis of a revision notice that does not explain why the expanded respondent pool is necessary, does not disclose the true burden on small rural farms, does not assess state system alternatives, and does not assess electronic submission alternatives. The revision is deficient on its face.

SECTION II — DEMANDED ACTIONS

Demanded Action 1 — OMB

OMB shall reject the proposed revision to OMB Control Number 0579-0090 until APHIS: provides a corrected burden estimate based on true small farm respondent time-use data; explains the reason for the respondent increase; demonstrates no duplication with state veterinary systems; and assesses electronic submission alternatives. Deadline: Immediate rejection.

Demanded Action 2 — OIRA

OIRA shall conduct an independent review of APHIS information collection burden estimates across all USDA APHIS programs and determine whether APHIS's systematic use of minimal per-response time estimates — without accounting for specimen collection, preparation, and transport burden — reflects agencywide PRA non-compliance. Deadline: 90 days from this comment.

Demanded Action 3 — APHIS

APHIS shall prepare a revised revision notice addressing all deficiencies identified herein, publish it in the Federal Register with a new 60-day comment period, and resubmit to OMB. Deadline: 120 days from this comment.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
44 U.S.C. Section 3507(a)(2)	OMB Review Authority	OMB must determine necessity of collection — cannot do so on deficient submission
44 U.S.C. Section 3507(a)(1)	OMB Approval Requirements	OMB approval requires PRA compliance — current submission is non-compliant on multiple grounds
44 U.S.C. Section 3508	PRA Duplication Prohibition	State system duplication not assessed — OMB cannot approve without duplication analysis
44 U.S.C. Section 3506(c)(3)	PRA Automation Requirement	Electronic submission alternative not assessed — OMB cannot approve without automation analysis
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	OMB approval of non-compliant submission would itself be arbitrary and capricious
E.O. 12866	OIRA Cost-Benefit Review	OIRA should review APHIS collection practices agencywide — systemic PRA non-compliance warrants review
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Judicial Precedent	OMB must examine relevant data before approving — deficient submission prevents this examination
5 U.S.C. Sections 601-612	Regulatory Flexibility Act	OMB approval of IRFA-deficient submission violates RFA — small farm analysis must be adequate

APA Section 706 rights reserved.

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-09 OF 20
TITLE	Animal Health Protection Act Scope: 7 U.S.C. Section 8301 Does Not Authorize Unlimited Expansion of Specimen Collection Forms — Statutory Limits Must Be Enforced
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

The Animal Health Protection Act, 7 U.S.C. Section 8301 et seq., provides APHIS with broad authority to conduct disease surveillance necessary to prevent the introduction or spread of any pest or disease of livestock. This authority is broad, but it is not unlimited. The APA requires that agency actions be within the scope of statutory authority, and the PRA requires that information collections be necessary for the proper performance of agency functions as authorized by statute. APHIS's expansion of the Specimen Submission respondent pool must be justified within the bounds of the statutory surveillance authority — not as an exercise of administrative discretion untethered from statutory necessity.

Specifically, APHIS must demonstrate: that the expanded respondent pool is necessary to prevent or detect the specific disease threats that the Animal Health Protection Act authorizes surveillance to address; that the expanded surveillance scope is proportionate to the identified disease risks; and that the expanded collection is the minimum information necessary for the surveillance function — not more information than is needed because more information is generally useful for program management.

SECTION II — DEMANDED ACTIONS

Demanded Action 1

APHIS shall publish a statutory authority analysis identifying the specific Animal Health Protection Act provisions that authorize the expanded Specimen Submission respondent pool, with specific identification of the disease threats being addressed and the relationship between the expanded surveillance scope and those threats. Deadline: 90 days from this comment.

Demanded Action 2

APHIS shall demonstrate that the expanded Specimen Submission collection is the minimum information necessary for the statutory surveillance function — not the maximum information that would be useful for program management. Any data elements that serve program management rather than statutory surveillance shall be removed. Deadline: Prior to renewal.

Demanded Action 3

OMB shall not approve any expansion of the Specimen Submission respondent pool without a written APHIS analysis of the statutory authority and necessity for the expansion. Deadline: Immediate OMB condition.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
7 U.S.C. Section 8301 et seq.	Animal Health Protection Act	Governing statute for APHIS surveillance authority — expansion must be within statutory scope and proportionate to disease risk
7 U.S.C. Section 8302	AHPA Definitions	Disease pest definitions limit surveillance scope — collection must be limited to AHPA-defined disease threats
5 U.S.C. Section 706(2)(C)	APA Ultra Vires Review	Collection beyond statutory authority is void — OMB cannot approve collection that exceeds AHPA scope
44 U.S.C. Section 3506(c)(1)	PRA Practical Utility — Statutory Necessity	Practical utility requires necessity for agency functions as authorized by statute — program management data exceeds this
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	Expansion without statutory necessity demonstration is arbitrary — State Farm applies
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Judicial Precedent	Statutory authority for expansion is relevant data that must be examined — APHIS has not examined it
E.O. 12866	OIRA Cost-Benefit Review	Disease risk justifying expansion must be quantified and weighed against burden — never done
44 U.S.C. Section 3501 et seq.	Paperwork Reduction Act	Minimum necessary information principle — collection limited to AHPA statutory necessity

APA Section 706 rights reserved.

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-10 OF 20
TITLE	Cattle Fever Tick Program Audit: Parasite Submission Forms for Tick Surveillance Must Be Evaluated for Necessity Independently of General Specimen Submission
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

The APHIS Specimen Submission collection includes, within OMB Control Number 0579-0090, the Parasite Submission form used for the Cattle Fever Tick Eradication Program (CFTEP) and the National Tick Surveillance Program. These parasite surveillance forms serve a distinct purpose from the general livestock disease surveillance Specimen Submission form — and they impose distinct burdens on a distinct population of respondents. APHIS has bundled these forms into a single collection without independently justifying the necessity of each parasite form element or analyzing the specific burden imposed on the CFTEP respondent population.

The Cattle Fever Tick Eradication Program operates in a specific geographic area — primarily the Texas-Mexico border region and quarantine areas — and imposes requirements on cattle operators in those areas to submit tick specimens as part of a long-running eradication effort. The burden on a CFTEP quarantine zone cattle operator — who must systematically inspect animals for ticks and submit specimens as a condition of operating within the quarantine zone — is fundamentally different from the burden on a general livestock surveillance respondent. These distinct programs deserve distinct burden analyses.

SECTION II — DEMANDED ACTIONS

Demanded Action 1

APHIS shall separate the Parasite Submission form for CFTEP and National Tick Surveillance from the general Specimen Submission collection and submit it to OMB as a separate information collection request with an independent burden analysis, necessity analysis, and IRFA. Deadline: Prior to renewal of 0579-0090.

Demanded Action 2

APHIS shall conduct an independent program effectiveness review of the Cattle Fever Tick Eradication Program, examining the relationship between the Parasite Submission information collection burden imposed on quarantine zone cattle operators and the eradication outcomes achieved, and publish the results. Deadline: 180 days from this comment.

Demanded Action 3

GAO shall audit the Cattle Fever Tick Eradication Program — its cost, its progress, and the burden it imposes on affected cattle operators — as part of the broader APHIS program audit demanded in Document APHIS-11. Deadline: GAO inquiry initiation within 60 days.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
44 U.S.C. Section 3501 et seq.	Paperwork Reduction Act	Bundled collections obscure burden analysis — CFTEP parasite forms require separate PRA treatment
7 U.S.C. Section 8301 et seq.	Animal Health Protection Act	CFTEP authority is distinct from general surveillance authority — separate statutory analysis required
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	Bundling distinct programs into single collection without separate analysis is arbitrary
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Judicial Precedent	CFTEP-specific burden data is relevant data that must be examined separately — not bundled into average
31 U.S.C. Section 717	GAO Performance Audit Authority	CFTEP program effectiveness warrants GAO audit — long-running program with significant respondent burden
5 U.S.C. Sections 601-612	Regulatory Flexibility Act	CFTEP quarantine zone cattle operators face distinct and more intensive burden — separate IRFA required
E.O. 12866	OIRA Cost-Benefit Review	CFTEP program effectiveness versus burden never independently analyzed — significant analytical gap
Pub. L. 101-576	Chief Financial Officers Act	CFTEP is a long-running program with substantial cost — CFO Act financial efficiency review overdue

APA Section 706 rights reserved.

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-11 OF 20
TITLE	GAO Audit Request: APHIS Administrative Costs vs. Disease Prevention Outcomes — Return on Investment of Specimen Collection Program Must Be Independently Assessed
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

This document constitutes a formal request to the U.S. Government Accountability Office pursuant to 31 U.S.C. Section 717 to conduct a performance audit of the APHIS Veterinary Services specimen collection and disease surveillance programs, examining the ratio of program costs — including the true private-sector burden imposed on farmers and veterinarians — to disease prevention outcomes achieved, and assessing whether the current program design delivers the best possible surveillance value relative to the burden it imposes.

APHIS's disease surveillance programs impose approximately 30,930 hours of annual burden on private respondents — hours that represent real economic costs to rural farmers and veterinarians. APHIS has never published a program effectiveness analysis demonstrating the disease outbreaks prevented, the economic losses averted, or the public health benefits achieved per dollar of private-sector surveillance burden imposed. Without this analysis, neither OMB nor Congress can determine whether the program's burden is proportionate to its benefit.

SECTION II — DEMANDED ACTIONS

Demanded Action 1 — GAO

The GAO shall conduct a performance audit of APHIS Veterinary Services disease surveillance programs examining: the true total cost of the surveillance system including private-sector burden at corrected rates; the disease events detected and prevented through the Specimen Submission collection; the cost per disease event detected; and whether electronic submission and state-led surveillance alternatives would deliver equivalent outcomes at lower cost. Deadline: Initiated within 60 days.

Demanded Action 2 — Congress

The Senate and House Agriculture Committees shall request the GAO audit demanded herein and shall hold an oversight hearing on APHIS surveillance program efficiency. Deadline: Immediate request.

Demanded Action 3 — APHIS

APHIS shall cooperate fully with GAO's audit and shall provide all program effectiveness data, including disease events detected, outbreaks prevented, and laboratory result data related to Specimen Submission collections. Deadline: Upon GAO request.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
31 U.S.C. Section 717	GAO Performance Audit Authority	GAO may audit federal program efficiency — APHIS surveillance program cost-benefit ratio warrants audit
31 U.S.C. Sections 3521-3527	GAO Waste Fraud Abuse Mandate	Surveillance burden without demonstrated disease prevention return qualifies as potential waste
44 U.S.C. Section 3501 et seq.	Paperwork Reduction Act	True burden of surveillance program is a cost that GAO should quantify independently
7 U.S.C. Section 8301 et seq.	Animal Health Protection Act	Program effectiveness in preventing disease introduction is the statutory measure of success — GAO should assess it
Pub. L. 101-576	Chief Financial Officers Act	APHIS surveillance program costs versus disease prevention outcomes is a CFO Act financial efficiency question
E.O. 12866	OIRA Cost-Benefit Review	Program cost-benefit analysis never performed — GAO audit will produce data OIRA should have required
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	GAO findings will support APA record — burden without demonstrated benefit is relevant data
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Judicial Precedent	Disease prevention outcomes per dollar of surveillance burden is relevant data that must be examined

APA Section 706 rights reserved. Transmitted to GAO and Agriculture Committees.

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-12 OF 20
TITLE	Congressional Agriculture Committee Notice: Senate and House Agriculture Committees Must Review APHIS Surveillance Expansion and Its Impact on Rural Small Farms
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

This document constitutes formal written notice to the Senate Committee on Agriculture Nutrition and Forestry and the House Committee on Agriculture that APHIS's proposed revision to OMB Control Number 0579-0090 — expanding the Specimen Submission respondent pool without adequate justification and understating the burden on rural small farms — warrants Congressional oversight. APHIS's disease surveillance programs must be accountable to Congress and to the rural farming communities whose cooperation they depend upon.

The rural small farms and veterinary practitioners who bear the burden of the APHIS Specimen Submission collection are the same communities that Congress has consistently sought to protect through farm bill provisions, rural development programs, and agricultural safety net legislation. Congressional oversight should ensure that APHIS's administrative expansion of surveillance programs does not impose burdens on these communities that Congress has not authorized and that are not proportionate to the disease surveillance value achieved.

SECTION II — DEMANDED ACTIONS

Demanded Action 1 — Senate Agriculture Committee

The Senate Committee on Agriculture Nutrition and Forestry shall hold an oversight hearing on APHIS disease surveillance program expansion, examining: the justification for the increase in Specimen Submission respondents; the true burden on rural small farms versus APHIS's disclosed estimate; and the case for a state-led surveillance model. Deadline: Within current Congressional session.

Demanded Action 2 — House Agriculture Committee

The House Committee on Agriculture shall request GAO analysis of APHIS surveillance program cost-effectiveness and shall review APHIS's PRA compliance practices across all USDA APHIS programs. Deadline: Immediate request.

Demanded Action 3 — Congress

Congress shall consider farm bill language requiring APHIS to: adopt electronic submission for all Specimen Submission programs within two years; negotiate state data sharing agreements eliminating duplicative federal

collection; and publish annual program effectiveness reports measuring disease events detected per dollar of private-sector burden imposed. Deadline: Next farm bill cycle.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
7 U.S.C. Section 8301 et seq.	Animal Health Protection Act	APHIS surveillance authority is Congressional grant — Congressional oversight is appropriate mechanism for ensuring proportionate use
44 U.S.C. Section 3501 et seq.	Paperwork Reduction Act	Congressional mandate for burden minimization — oversight required when agencies expand burden without adequate justification
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	Pattern of burden expansion without adequate justification is APA concern — Congressional oversight supports judicial review record
31 U.S.C. Section 717	GAO Authority	Agriculture committees should request GAO audit recommended in Document APHIS-11
U.S. Const. Art. I	Congressional Oversight	Congress has authority and responsibility to oversee federal agency administrative practices affecting rural constituents
Pub. L. 101-576	Chief Financial Officers Act	APHIS administrative expansion is CFO Act concern — Congressional oversight is appropriate mechanism
E.O. 13132	Federalism	Congressional oversight can reinforce state authority over surveillance — state-led model needs Congressional support
E.O. 12866	OIRA Cost-Benefit Requirement	OIRA review of APHIS collections is overdue — Congressional pressure can accelerate this

Transmitted to Senate and House Agriculture Committees. APA rights reserved.

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-13 OF 20
TITLE	CFO Act Deficiency: 30,930 Hours of Annual Burden at Rural Veterinarian Labor Rates Represents Tens of Millions in Uncompensated Private Sector Cost — Never Weighed Against Surveillance Value
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

The Chief Financial Officers Act of 1990, Pub. L. 101-576, requires federal agencies to improve financial management practices and evaluate the effectiveness of federal financial programs. The APHIS Specimen Submission collection imposes 30,930 disclosed burden hours annually on private-sector respondents — hours that represent real economic costs to rural farms and veterinary practices. At corrected burden estimates of 1.5 to 5 hours per response across 95,060 responses, the true annual private-sector cost is estimated at 142,590 to 475,300 hours. At an agricultural and veterinary labor cost of \$20 to \$60 per hour, this represents \$2.85 million to \$28.5 million in annual uncompensated private-sector surveillance costs. APHIS has never weighed this cost against the disease surveillance value achieved.

A CFO Act-compliant analysis of the Specimen Submission program would require APHIS to determine: the total annual cost of the surveillance system including federal administrative costs and private-sector burden at corrected rates; the disease surveillance outcomes achieved — diseases detected, outbreaks prevented, economic losses averted; the cost per disease event detected; and whether the current program design delivers the best surveillance return on the total cost investment. None of this analysis has ever been performed.

SECTION II — DEMANDED ACTIONS

Demanded Action 1

The USDA Chief Financial Officer shall conduct and publish a CFO Act-compliant financial efficiency analysis of the APHIS Specimen Submission program comparing total program cost — including private-sector burden at corrected rates — to disease surveillance outcomes measured in disease events detected and economic losses prevented. Deadline: 120 days from this comment.

Demanded Action 2

OMB's Office of Federal Financial Management shall review APHIS disease surveillance program costs under CFO Act financial management standards and determine whether the current program design delivers a positive return on the total cost it imposes on the federal government and the private sector. Deadline: 180 days from this comment.

Demanded Action 3

APHIS shall adopt the electronic submission, state data sharing, and simplified form measures demanded across this package as the CFO Act-consistent alternatives that reduce administrative costs while preserving surveillance value. Deadline: Prior to renewal.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
Pub. L. 101-576	Chief Financial Officers Act of 1990	Requires financial efficiency evaluation — APHIS surveillance costs of \$2.85M to \$28.5M annually never evaluated against disease prevention outcomes
7 U.S.C. Section 8301 et seq.	Animal Health Protection Act	Program effectiveness is the statutory measure — CFO Act requires ensuring costs are proportionate to statutory outcomes
44 U.S.C. Section 3501 et seq.	Paperwork Reduction Act	Private-sector surveillance burden is a cost — CFO Act and PRA work together to require cost-effectiveness
31 U.S.C. Section 717	GAO Authority	GAO audit demanded in APHIS-11 will produce CFO Act data — documents are complementary
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	CFO Act non-compliance compounds APA violation — surveillance costs never weighed against disease prevention value
E.O. 12866	OIRA Cost-Benefit Review	\$2.85M to \$28.5M annual private-sector cost must be weighed against surveillance benefit — analysis never done
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Judicial Precedent	Cost-per-disease-event-detected is relevant data that must be examined — APHIS has not examined it
5 U.S.C. Sections 601-612	Regulatory Flexibility Act	Small rural farm burden is disproportionate share of total cost — CFO Act and RFA concerns compound

APA Section 706 rights reserved.

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-14 OF 20
TITLE	Privacy and Biosecurity Concerns: Herd Owner and Animal Location Data Collected on Specimen Forms Creates Privacy and Biosecurity Exposure — Privacy Act Compliance Required
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

The APHIS Specimen Submission form collects data that identifies: the herd owner's name and contact information; the geographic location of the herd; the animal identification numbers; the herd size and composition; and the suspected disease being tested. This combination of data points creates a federal database of herd owner locations, animal identification information, and disease testing history that has significant privacy and biosecurity implications. APHIS has never published a Privacy Impact Assessment for this collection that adequately addresses these risks. Herd location data is operationally sensitive — it identifies the geographic coordinates of valuable livestock assets. Animal disease testing data is commercially sensitive — it reveals herd health status that could affect market value and insurance. The association between herd owner identity, location, and disease testing history in a federal database creates a data profile that rural farmers have a reasonable expectation of privacy in, and that APHIS has never demonstrated is adequately protected against unauthorized access or disclosure.

SECTION II — DEMANDED ACTIONS

Demanded Action 1

APHIS shall publish a Privacy Impact Assessment for the Specimen Submission collection that specifically addresses: the scope of herd owner, location, and animal data collected; the federal database architecture storing this data; access controls; retention period; data sharing with state agencies and other federal agencies; and the biosecurity implications of aggregating herd location and disease testing data in a federal database. Deadline: 60 days from this comment.

Demanded Action 2

APHIS shall implement data minimization measures — collecting only the minimum herd owner and location data necessary for surveillance result reporting and follow-up — and shall not collect data elements that serve program management functions beyond the immediate surveillance necessity. Deadline: Prior to renewal.

Demanded Action 3

APHIS shall provide herd owners with Privacy Act notice at the time of specimen submission identifying the legal authority for collection, the uses of the data, and the data retention period, consistent with 5 U.S.C. Section 552a(e)(3). Deadline: Upon renewal of collection.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
5 U.S.C. Section 552a	Privacy Act of 1974	Herd owner personal data must comply with Privacy Act — no Privacy Impact Assessment published
5 U.S.C. Section 552a(e)(1)	Privacy Act Necessity Requirement	Only relevant and necessary information may be collected — herd owner data beyond surveillance necessity fails this test
5 U.S.C. Section 552a(e)(3)	Privacy Act Notice Requirement	Notice must be given at time of collection — herd owners receive no adequate Privacy Act notice
44 U.S.C. Section 3506(c)(1)	PRA Practical Utility	Privacy-sensitive data elements must serve surveillance function — program management data fails this test
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	Collecting privacy-sensitive herd location data without Privacy Impact Assessment is arbitrary
7 U.S.C. Section 8301 et seq.	Animal Health Protection Act	Surveillance authority does not authorize unlimited collection of herd owner private data — scope limited by statute
E.O. 13526	Information Security	Herd location and disease testing database has biosecurity implications requiring security review
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Judicial Precedent	Privacy and biosecurity risks are relevant data that must be examined — APHIS has not examined them

APA Section 706 rights reserved.

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-15 OF 20
TITLE	Duplication with State Systems: State Veterinarians Already Maintain This Data — Federal Collection Is Duplicative Under PRA Section 3508 — Data Sharing Must Replace Duplicate Collection
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

PRA Section 3508 prohibits federal agencies from collecting information that is available from another federal agency or public source if that information is adequate for the agency's purposes. State veterinary diagnostic laboratories — including Georgia's GDIAL network — collect specimen submission data that is substantially equivalent to the data on APHIS's federal Specimen Submission form for the same specimens submitted through state laboratory systems. APHIS has never conducted the duplication analysis that PRA Section 3508 requires.

The PRA's anti-duplication principle is not merely procedural — it reflects a substantive policy judgment that the burden of duplicate data collection is never justified when adequate data is available from existing sources. When a Georgia livestock farmer submits a specimen through the GDIAL system, the state already has the surveillance data that APHIS's federal form would collect. APHIS's additional federal collection of the same data — for specimens already in the state system — imposes burden without producing new surveillance information. This is the definition of unjustified duplication.

SECTION II — DEMANDED ACTIONS

Demanded Action 1

APHIS shall conduct and publish a duplication analysis identifying all Specimen Submission data elements that are also collected by state veterinary diagnostic laboratory systems under APHIS cooperative agreements, specifically including Georgia GDIAL, Texas A&M TVMDL, and other state laboratory networks. Deadline: 90 days from this comment.

Demanded Action 2

APHIS shall negotiate electronic data sharing agreements with state veterinary diagnostic laboratory networks to obtain state-collected specimen submission data electronically, eliminating the need for separate federal form submissions for specimens already reported to state systems. Deadline: 180 days from this comment.

Demanded Action 3

APHIS shall reduce the federal Specimen Submission respondent pool to exclude specimens already submitted through state veterinary diagnostic laboratory systems with data sharing agreements, counting only specimens submitted directly to NVSL without state system involvement. Deadline: Prior to renewal.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
44 U.S.C. Section 3508	PRA Duplication Prohibition	Federal collection of data already in state laboratory systems is duplicative — APHIS must eliminate
44 U.S.C. Section 3501 et seq.	Paperwork Reduction Act	Anti-duplication is core PRA mandate — state data sharing eliminates burden at zero surveillance cost
7 U.S.C. Section 8301 et seq.	Animal Health Protection Act	Cooperative state-federal surveillance framework envisioned by statute — data sharing implements this framework
E.O. 13132	Federalism	State veterinary data is state resource — federal duplication of state data collection violates federalism principles
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	Collecting data already available from state systems is arbitrary — no rational basis for duplication
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Judicial Precedent	State data sharing alternative is relevant alternative that must be evaluated — APHIS has not evaluated it
E.O. 12866	OIRA Cost-Benefit Review	Eliminating duplicate collection through state data sharing reduces burden at near-zero cost — significant benefit never analyzed
Pub. L. 101-576	Chief Financial Officers Act	Paying private-sector surveillance burden for data already available from state systems is financial inefficiency

APA Section 706 rights reserved.

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-16 OF 20
TITLE	USDA OIG Referral: APHIS Pattern of Expanding Surveillance Reporting Without Genuine PRA Compliance Warrants Inspector General Review
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

This document constitutes a formal referral to the USDA Office of Inspector General pursuant to the Inspector General Act of 1978, 5 U.S.C. Appendix Section 2, requesting an investigation into whether APHIS's pattern of expanding the Specimen Submission respondent pool without adequate PRA justification, understating the true burden on rural small farms in OMB submissions, and failing to assess state data sharing and electronic submission alternatives reflects a systemic PRA non-compliance pattern that warrants USDA OIG scrutiny.

APHIS has expanded the Specimen Submission collection without adequate explanation of the surveillance necessity for the expansion; submitted burden estimates to OMB that materially understate the true small farm burden; failed to assess electronic submission alternatives as required by PRA Section 3506(c)(3); failed to conduct a duplication analysis as required by PRA Section 3508; and failed to publish a Privacy Impact Assessment for a collection that includes personal and commercially sensitive herd owner and animal data. This pattern suggests systemic PRA non-compliance at the APHIS Veterinary Services level.

SECTION II — DEMANDED ACTIONS

Demanded Action 1 — USDA OIG

The USDA OIG shall open an inquiry into APHIS Veterinary Services PRA compliance practices, examining whether burden estimates are systematically understated, whether automation assessments are conducted as required, and whether duplication analyses are performed before collections are expanded. Deadline: 90 days from this referral.

Demanded Action 2 — USDA OIG

The OIG shall transmit findings to OMB and to the Senate and House Agriculture Committees with recommendations for corrective action. Deadline: 120 days from referral.

Demanded Action 3 — APHIS

APHIS shall cooperate fully with the OIG inquiry and shall provide all PRA submission records, burden calculation methodologies, and automation assessment documentation for all Veterinary Services information collections. Deadline: Upon OIG request.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
5 U.S.C. App. Section 2	Inspector General Act of 1978	USDA OIG authorized to investigate APHIS management challenges — PRA non-compliance pattern warrants investigation
44 U.S.C. Section 3501 et seq.	Paperwork Reduction Act	Systematic PRA non-compliance is the subject of referral — OIG should assess agencywide compliance practices
44 U.S.C. Section 3508	PRA Duplication Prohibition	Failure to conduct duplication analysis is part of pattern — OIG should assess compliance
44 U.S.C. Section 3506(c)(3)	PRA Automation Requirement	Failure to assess electronic submission alternatives — OIG should assess compliance
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	OIG findings will support APA record — pattern of administrative mismanagement is documented
31 U.S.C. Sections 3521-3527	Waste Fraud Abuse Mandate	Expanding surveillance burden without demonstrated necessity qualifies as potential administrative waste
7 U.S.C. Section 8301 et seq.	Animal Health Protection Act	OIG should assess whether surveillance expansion is within statutory authority and proportionate to disease risk
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Judicial Precedent	OIG findings will document pattern of arbitrary collection expansion — supports judicial review record

Transmitted to USDA OIG. APA rights reserved.

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026

DOCKET	APHIS-2025-0704 OMB Control No. 0579-0090
AGENCY	Animal and Plant Health Inspection Service — USDA
DOCUMENT	DOCUMENT APHIS-19 OF 20
TITLE	Technology Modernization Demand: APHIS Must Deploy Electronic Specimen Submission Systems Accessible to Rural Farms Before Renewing Paper-Based Collections
PORTAL	regulations.gov — APHIS-2025-0704
DUE DATE	March 10, 2026

Filer	James Hunter Poole — Executive Chairman & CEO, Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural High-Poverty Census Tract — ~23% poverty / ~14% BA)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI Autonomy, Quantum Comms, Critical Infrastructure Protection
Credentials	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB ISSN APPL0006091
Filed	March 10, 2026

SECTION I — THE CORE PROBLEM

APHIS cannot justify renewing a paper-based or PDF-based Specimen Submission collection without first demonstrating that it has evaluated, and where feasible deployed, electronic submission alternatives that reduce the burden on rural small farm submitters. The PRA Section 3506(c)(3) automation requirement is not optional — it is a mandatory burden minimization obligation. APHIS's failure to mandate electronic submission for the Specimen Submission collection while renewing the collection for another three years is a clear PRA violation.

The technology for electronic specimen submission systems — including mobile-accessible forms, GPS-enabled location data, automated laboratory routing, and chain-of-custody tracking — is fully mature and commercially available. Obelisk Tech Systems Inc., as a defense technology company specializing in AI automation and cybersecurity software, has direct expertise in the deployment of mobile-accessible electronic data collection systems for rural environments with limited connectivity. Electronic submission systems can be designed to function in offline mode, synchronizing when connectivity is available — making them fully accessible to rural farms without reliable broadband.

SECTION II — DEMANDED ACTIONS

Demanded Action 1

APHIS shall develop and deploy a mobile-accessible electronic Specimen Submission system that: functions in offline mode for rural areas without reliable connectivity; pre-populates returning submitter data; provides automated laboratory routing; integrates with state veterinary laboratory information management systems; and provides real-time submission tracking for submitters. Deadline: Prior to any renewal of OMB Control Number 0579-0090.

Demanded Action 2

APHIS shall conduct and publish an assessment of available electronic submission technologies for the Specimen Submission collection, including the cost of deployment, the burden reduction potential, and the feasibility of rural accessibility, before submitting any renewal to OMB. Deadline: 90 days from this comment.

Demanded Action 3

OMB shall condition any renewal of OMB Control Number 0579-0090 on APHIS deploying an electronic submission system accessible to all categories of submitters — including rural farms without broadband — within 18 months of the renewal approval. Deadline: Immediate OMB condition.

CROSS-CUTTING LAW CODE TABLE

Code / Authority	System	Role in This Comment
44 U.S.C. Section 3506(c)(3)	PRA Automation Requirement	APHIS must deploy electronic submission — failure to do so before renewal is PRA violation
44 U.S.C. Section 3501 et seq.	Paperwork Reduction Act	Automation is mandatory burden minimization tool — renewing paper-based collection without deploying electronic alternative violates PRA
5 U.S.C. Section 706(2)(A)	Administrative Procedure Act	Renewing paper-based collection without evaluating available electronic alternatives is arbitrary — State Farm applies
E.O. 13960	AI in Government	Federal AI policy requires agencies to use technology to improve government services — electronic submission implements this policy
E.O. 12866	OIRA Cost-Benefit Review	30 to 50 percent burden reduction from electronic submission — significant cost saving that must be included in cost-benefit analysis
Infrastructure Investment and Jobs Act	Rural Broadband and Technology	Federal rural technology investment must be paired with electronic submission systems accessible to rural farms
Motor Vehicle Mfrs. v. State Farm, 463 U.S. 29 (1983)	APA Judicial Precedent	Available electronic submission technology is relevant alternative that must be evaluated — APHIS has not evaluated it
5 U.S.C. Sections 601-612	Regulatory Flexibility Act	Electronic submission most benefits small rural farms — RFA requires adoption of technology alternatives that reduce small entity burden

APA Section 706 rights reserved.

Respectfully submitted,

/s/ James Hunter Poole

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB | ISSN APPL0006091

Filed: March 10, 2026