April 3, 2017

William Smith
Associate Administrator
USDA FSIS Office of Field Operations
PHIS Executive Sponsor
Jamie Whitten Building Room: 344-E
Washington, D.C. 20024

Dear Mr. Smith:

The industry groups that have signed this letter commend the Food Safety and Inspection Service (FSIS) for their efforts in implementing the Public Health Information System (PHIS) Export module. It is imperative that the agency and industry continue to work together on the implementation, and we appreciate your consideration of our requests. We value the information provided at the PHIS meeting on March 27, 2017, and we are grateful for the opportunity to share our comments and requests.

As mentioned by many of the companies during the meeting, the industry needs to have the implementation date extended 10-12 months from the original implementation date of June 29, 2017. A clear majority of export certificates will be issued by large production companies that have established, internal computer systems that need to connect directly with the PHIS system. There are several companies which have IT departments that need to schedule the implementation on a company-to-FSIS basis. In many cases the IT departments currently have full workloads and need adequate time to prepare for the PHIS installation requirements. In either scenario, this may take several months. In addition, smaller companies also support extending the implementation date 10-12 months to allow for training and integrating the web based system into their business applications.

In addition, there are other issues that need to be addressed for the implementation to be successful for both the industry and FSIS:

1. Provide a "back-up" process that must also be tested and in place for times when the PHIS system is down or a system failure occurs. A well-defined, robust contingency plan should be made available to the industry. This is a very critical issue for the industry as many facets must be coordinated together (staging on shipping docks, availability of the FSIS inspector, availability of shipping container, shipping times, etc.). Any down time of the PHIS system will create down time within the other facets of the exporting process. The industry feels the best back-up system is to have to ability to revert to the company's in-house, automated system until the PHIS system resumes export functionality.
2. Immediately provide the industry with a real-time demonstration of the PHIS software capabilities and set up specific beta testing exercises for both the web-based system and the computer-to-computer applications. Allow for beta testing to be conducted over several months so sufficient corrections can be made to the FSIS and company systems, if necessary.
3. The discussion on managing the product weight was confusing to the industry. Having the PHIS system calculate the weight will be burdensome, with the possibility of inaccuracies

causing confusion at the foreign destinations. The companies have the actual weights in a form that is acceptable to the various countries and it would be best if the weight was entered into PHIS by the company. We want to avoid situations that were discussed during the webinar that could lead to needing replacement certificates because of the final weight. We believe the system should allow for weight changes up until the time the inspector signs the 9060-5.

4. The date of signing by the FSIS inspector relative to the shipping dates can also be problematic for some countries that require the signing date to be on or before the shipping date.

5. Further clarification is needed on the security information on the Service Account ownership.

6. Allow companies to meet individually with FSIS to discuss specific needs of connecting computer-to-computer to facilitate data transfer. Individual meetings should be allowed to occur past the implementation date. The industry understands that each company will utilize different IT applications and the need for FSIS to recognize these differences within their IT capabilities.

7. Because of the variation for each company in the time to install the XML Schema, and due to the volume of users in corporate offices, plants, and cold storages, there is a need for basic training of all users. The industry requests having the ability to utilize demonstration and training applications.

8. Provide to the industry the implementation schedule for adding the next group of countries to the PHIS system.

The industry appreciates the opportunity to provide specific questions through the email address provided and looks forward to the feedback. Thank you in advance for reviewing and addressing these issues.

Sincerely,

Global Cold Chain Alliance

North American Meat Institute

USA Poultry and Egg Council

U.S. Meat Export Federation