

## **RESPONDENT A**

it feels like a pretty extreme overstepping of boundaries. Shippers are being asked for sensitive contract info (like pricing, bill of lading and customer info), it is SIGNIFICANTLY more time consuming than the legacy system, adds no value to trade participants nor marketplace, and is a privacy/security issue. Further-- the roll out, training, and receptiveness to user feedback has been really poor.

## **RESPONDENT B**

- 1) Whether collection of contract-based information will help improve the timeliness and reliability of the data in USDA's Export Sales Reports: RESPONSE: The huge burden of additional information for reporting Export sales will decrease timeliness and reliability simply due to the level of detail and time need to create the report by exporters, the more you ask for the harder it is to become accurate timely reports. Many times less is more, that applies here.
- 2) the accuracy of the agency's estimate of the burden of the collection of information including validity of the methodology and assumption used; RESPONSE the burden is shifted from USDA to the exporter, keep the burden with the USDA.
- 3) ways to enhance the quality, utility, and clarity of the information collected; RESPONSE: Go back to the original ESRMS system.
- 4) ways to minimize the burden of the collection of information on those who are required to report, including through the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.  
RESPONSE: Find ways to incorporate AI.

## **RESPONDENT C**

USDA should now establish separate categories for the value-added soybeans and soybean oils (e.g., high oleic and low-linolenic soybean oil, high oleic and high-linolenic soybean oil, high oleic soybean meal, etc.).

## **RESPONDENT D**

the new system is more time consuming and less user friendly, increasing the likelihood of more errors or oversights. the excel upload process might be helpful for larger companies but for a smaller entity the work to format and then the cost to upgrade systems to export the information is not something we can handle. this process will cause issues with coverage during vacations in regards to cross-training. It is a time consuming difficult process that will become easier the more you use it, but for smaller companies if someone need leave or vacation there will need to be coverage and this will cause issues from a user standpoint. None of that talks about the almost intrusive amount of data required. The information requested seems excessive when taking with the other places we submit information, it seems this is information already submitted with other entities and redundant. We will need to pull from various places in our systems to submit so again this will add extra layers and time. a 30 to 50% increase in workload or time spent on this is a large change for what seems to be a very small increase in information or value gained.

## **RESPONDENT E**

- 1) whether collection of contract-based information will help improve the timeliness and reliability of the data in USDA's Export Sales Reports;
  - a. I don't think collection of contract-based information will improve timeliness and reliability. Contract based information was already gathered on a quarterly basis to assist in reconciliation and to ultimately have correct information. By collecting weekly data with contract-based information, I believe it opens it up for MORE errors in entry than previous simply due to the additional volume of entries required.
  - b. If container by container entry is required this will become a major burden.
  - c. Will entries be required when NO shipment has taken place? Under the old system, we always entered 0s for when we didn't ship anything. If that continues with 2.1, this will be an additional burden simply to go through every contract to enter 0. I do not believe this improves the timeliness and reliability of information. In fact, I think it will reduce the timeliness & reliability.
- 2) the accuracy of the agency's estimate of the burden of the collection of information including validity of the methodology and assumption used;
  - a. So much of the burden of data collection is dependent on what's required of entry:
    - i. If its container by container, the burden will be very big. Additionally, I don't think it gives the USDA any better information.
    - ii. If you are required to make entries for every contract; regardless if shipments were sent, it will be a much bigger burden than the old system.
- 3) ways to enhance the quality, utility, and clarity of the information collected;
  - a. When the new system rolled out last fall, I know I struggled to get "reports" that confirmed my entries, etc. Reports and summaries to compare my information with what I reported is important.

## **RESPONDENT F**

The proposed system will not 1) improve the timeliness and reliability of the data in the USDA's Export Sales Reports, will not 2) provide accurate and valid information because assumptions of normal "grain" transactions to not apply to the market they are intending to survey, will not 3) enhance quality and clarity of the information collected and in fact will create less transparency and reduce clarity, will not 4) minimize the burden of the collection information on those who are required to report no matter what the methodology or technology is utilized.

Listen, if the ESRMS system worked then the current reported data would be 93% accurate and there'd be no need to try something new. This comes from the point of view that "most industry operators agree upon that companies like SSGA member exporters comprise roughly 7% of all exported soybeans. Trying to improve 7% of this market, even if it was possible to do and it was PERFECT, will not give USDA reps outside the US the info they need when they are confronted prospective buyers. If there is a positive, its that the USDA is trying because they now see us. Rather than focus on us, they need to use their power, prowess, existing network and experience and apply it to the entire soybean market by adding points of definition to 100% of

the market rather than 7%. the "93%" are exporting soybeans too and many of those soybeans are used for human food yet are defined as crush. THERE IS NO WAY THAT 7% OF US SOYBEANS ARE FEEDING THE WORLDS HUMAN POPULATION!!!!!!!!!! The USDA has a definition problem because properly defining/classifying US soybeans will cost "the market" more money and there-in-lies the problem. Forcing the 7% to open their books and disclose their proprietary details will come dangerously close if not crossing the line of anti-trust. The definition of inventory as we use it in this market sector will cause so much confusion it will degrade the image of the USDA. I could go on and on with more and more examples. There is no quick fix, this problem USDA is facing requires an industry restructuring like we haven't seen for 100 years. 2.1 is a HORRIBLE methodology as it is drafted right now today and ultimately will accelerate the demise of the very market they are wanting to monitor resulting in a greatly diminished data stream.