

# PUBLIC SUBMISSION

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**Docket:** FAS-2023-0002

Export Sales Reporting Program of U. S. Agricultural Commodities

**Comment On:** FAS-2023-0002-0002

Agency Information Collection Activities; Proposals, Submissions, and Approvals

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## Submitter Information

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## General Comment

1) whether collection of contract-based information will help improve the timeliness and reliability of the data in USDA's Export Sales Reports

a. Reliability:

i. The change from LBS to MT will significantly increase the variance of the actual weight due to rounding. If the change, whether it be increase/decrease/exported, is not large enough to be captured, the rounding will cause numerous line items to be counted as zero. When total weight is captured as a whole, the variance will be closer to actual numbers.

ii. Once it leaves the Midwest, it could change shipper company

b. Timeliness: It currently takes about 30 minutes to run reports needed and enter them into the USDA website. Making any change other than uploading the current information as a CSV file will increase the time spent for USDA reporting. – When Holly was doing the reporting during the first testing period, it took her almost all day.

2) ways to enhance the quality, utility, and clarity of the information collected

a. The amount of detail per order is excessive for the amount of orders we ship and very time consuming.

b. Tracking the life of the order in the system is difficult. The categories that are being required are very vague and the details reported could not be what is actually being asked.

c. Decrease the level of detail required. – The categories that are being required are very vague and the details reported could not be what is exactly being asked.

d. The rounding with that level of details makes the end result inaccurate.

3) 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.

a. Have a CSV file to upload that has the same information currently being reported. Upload it into the system for one batch, not single lines.

It doesn't make a lot of sense to be testing the exact same thing that came out last year and it didn't work.