

BRYANT CHRISTIE INC.
INTERNATIONAL AFFAIRS MANAGEMENT

August 20, 2012

Mr. Mark Slupek
Director, Program Operations Division
Foreign Agricultural Service
1400 Independence Avenue SW., Room 6510
Washington, DC 20250
podadmin@fas.usda.gov

RE: *Federal Register* Document Number 2012-15203 concerning the information collection process for the Technical Assistance for Specialty Crops (TASC) program

Dear Mr. Slupek:

Please accept the following comments in response to the U.S. Department of Agriculture (USDA) Commodity Credit Corporation's (CCC) request for comments regarding the current information collection process for the Technical Assistance for Special Crops (TASC) program.

Bryant Christie Inc. (BCI) is an international affairs management firm that helps companies and industry organizations eliminate trade barriers, develop new markets, and manage their international government affairs. BCI has worked with a number of agricultural industry organizations to obtain and utilize TASC grants since the program's inception in 2002. Additionally, BCI itself became a participant with the approval of TASC program funds in fiscal year 2010. Given our extensive background with TASC grants, BCI is acutely aware of the benefits afforded by the program.

As the number of bilateral and multilateral free trade agreements proliferate around the globe, the hurdles posed by tariffs and other traditional protectionist policies have diminished. Instead, a number of non-traditional technical barriers to trade have emerged, including but not limited to discrepancies in national pesticide maximum residue levels (MRLs), commodity-specific pest and pesticide management protocols, and various other sanitary and phytosanitary (SPS) issues. In the current global trade environment, BCI understands and deeply values the TASC program's stated goal of providing funding for projects and activities specifically addressing SPS and other technical barriers impeding the export of U.S. specialty crops. We sincerely appreciate the opportunities afforded by TASC funds to address these specific technical areas of concern, and fully support the program's continuation.

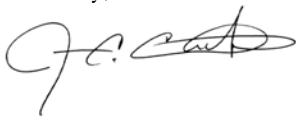
Given this background, BCI would like to recommend two relatively minor adjustments to the TASC program's administration. The first involves the comprehensive annual application process for multi-year projects. Rather than having to submit a comprehensive application each year following multi-year project approval, BCI respectfully requests that FAS only require the submission of an annual report in subsequent years for the

continuation of the project. If work is proceeding as planned, FAS acceptance of the annual report would be the only documentation required for the continuation of the project.

BCI's second recommendation applies to the reporting requirements for one-year projects. Per §1487.7 7 of CFR Part 1487, the TASC program requires, at a minimum, annual reports be submitted for each approved project. However, current FAS practices require quarterly reports for single year projects. While BCI understands the need to provide updates on approved projects that utilize TASC funds and supports this requirement, for all projects, BCI requests that FAS modify its current practices so that one-year projects only require an interim mid-year performance report and a final report at the end of the year upon the project's completion. Of course, more frequent reporting could be requested in special cases depending upon the nature of the project.

Thank you for your consideration of these requests. Please do not hesitate to contact me should you have any questions regarding this submission.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Christie", with a stylized flourish at the end.

James Christie
President