

## Ehrhart, Connie - FAS

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**From:** Michelle Paul <michelle.paul@bryantchristie.com>  
**Sent:** Tuesday, November 24, 2015 7:39 PM  
**To:** FAS-RMB-PodAdmin  
**Cc:** kathleen@grapesfromcalifornia.com; susan@grapesfromcalifornia.com; Foster, Christian - FAS  
**Subject:** CTGC Comments on FR Doc No 2015-24394  
**Attachments:** CA Table Grape Commission FR Doc No 2015-24394 11 24 15.pdf

*On behalf of the California Table Grape Commission*

Dear Sir/Madam:

Please find attached comments in response to the *Federal Register* notice issued on September 25, 2015 (FR Doc No: 2015-24394) regarding the information collection process for the Foreign Market Development (FMD) Cooperator Program and the Market Access Program (MAP).

Please let us know if you have any questions. Thank you.

Best regards,

Michelle

**Michelle Paul | Deputy Senior Manager, Marketing Accounts**



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November 24, 2015

Director, Program Operations Division  
USDA Foreign Agricultural Service  
Room 6510, STOP 1042  
1400 Independence Avenue SW  
Washington, DC 20250

Re.: FR Doc No: 2015-24394 - FMD/MAP Information Collection Process

Dear Director:

This letter from the California Table Grape Commission is being submitted in response to *Federal Register* notice issued on September 25, 2015 (FR Doc No: 2015-24394) requesting comments on the currently approved information collection process in support of the Foreign Market Development Cooperator (Cooperator) Program and the Market Access Program (MAP). The following comments are in response to areas specifically requested for comment(s):

1) Accuracy of Burden Estimate

The estimate of 20 hours per response is reasonable as it applies to the market evaluation and the general requests for information and input. The amount of time required to complete the Unified Export Strategy (UES) would be far greater, estimated between 65 and 70 hours. The amount of time, in hours, to develop one Country Progress Report is closer to 30 hours, and the success stories vary from 12 to 20 hours. Note that the estimated hours include time spent by all commission staff who are involved.

2) Ways to Minimize the Burden

Points to consider re: increasing efficiency and effectiveness as it pertains to the UES are:

- a. Confirm that the spreadsheet upload function works throughout the application, resulting in greater accuracy and faster upload time
- b. Confirm that the text upload function using RTF works throughout the application, resulting in a more uniform format and faster upload time
- c. Add the ability to upload success stories and Country Progress Reports in a format that matches existing FAS guidelines
- d. Revise the application report to:
  - i. Include headers, footers and page numbers
  - ii. Allow saving and editing in Word

- iii. Generate reports for individual markets
- e. Revise the relationship among activities, constraints and performance measures to allow cooperators to revise these items upon approval of the marketing specialist
- f. Address inconsistencies between the final rules, FAS guidelines, and the UES instructions, e.g., strategic plans

The California Table Grape Commission is charged with maintaining and expanding the market for fresh California table grapes worldwide. California produces 99 percent of the table grapes grown commercially in the U.S. with a value of over \$1.76 billion in the 2014-15 season. USDA FAS support for table grape exports, via Market Access Program and Technical Assistance for Specialty Crops funding, is a valuable partner to the work of the commission.

Please feel welcome to contact me with questions concerning these comments.

Regards,



Karen Hanson  
Vice President, Operations

cc: Kathleen Nave, California Table Grape Commission  
Susan Day, California Table Grape Commission  
Christian Foster, USDA/FAS/OTP

*Submitted electronically to: [podadmin@fas.usda.gov](mailto:podadmin@fas.usda.gov)*