

Dear OMB staff:

To follow up on the discussions about the readability of the current forms of official ID, as contrasted with the EID tags that would be required under the new rule, we'd like to direct your attention to three sets of photos and information.

- 1) USDA APHIS has published a document that includes both an explanation and visuals of the NUES tags, currently one of the official forms of ID. It is available at [https://www.aphis.usda.gov/traceability/downloads/ADT\\_device\\_nues.pdf](https://www.aphis.usda.gov/traceability/downloads/ADT_device_nues.pdf). Please note that, of the 8 or 9 digits, the first two are a state code, which means that the producer (who knows their state) need only read and transcribe 6 or 7 digits.
- 2) In addition, here is a picture of one of the commonly used tags with the NUES numbering:



- 3) An image of one of the approved EID tags is available at: [https://www.valleyvet.com/ct\\_detail.html?pgguid=3B4854E4-F2E3-4689-B0ED-E63E3431B620](https://www.valleyvet.com/ct_detail.html?pgguid=3B4854E4-F2E3-4689-B0ED-E63E3431B620). To continue the comparison, the first 3 digits (840 in this image) is the country code, so, again, the producer would know those. But that leaves 11 digits to be read and transcribed by all the producers (or vets or sale barns) who do not have an electronic reader -- and/or who do not have the equipment and time necessary to safely constrain the cow still enough to use an electronic reader.

In addition to the contrast between these two specific forms of ID, **it is critical to understand that the 2103 ADT rule allows for a wide range of forms of official identification, including brands in certain states.** The full range of choices was one of the key points of discussion in developing the 2013 ADT rule, because American cattle producers face a very wide range of situations and conditions. Replacing that wide range of options with the EID tags alone will impose significant burdens and problems on many producers.

Thank you for your attention to this vital issue for American cattle producers.

Sincerely,  
Judith McGeary  
Executive Director  
Farm and Ranch Freedom Alliance