

To Whom it May Concern,

Below you will find additional points outlined in our organizational comments that we did not verbally go over during our meeting yesterday due to time limitations. Thank you so much for your time yesterday and consideration of our written and verbal comments.

A. Additional Requests for the Final Rule

- a. Requiring retention of entry forms for the Tennessee Walking Horses, racking horses, and Spotted Saddle Horses
 - i. APHIS should require management to retain entry forms for 90 days and send it them to APHIS within five days following the conclusion of the event.
- b. APHIS should require a 6-year, rather than a 90-day, record retention period.
 - i. A 90-day retention period would make it difficult for APHIS to verify the accuracy of the data reported.
 - ii. In 2016, APHIS, in its formerly proposed rule, proposed a 6-year retention period, explaining that it would ensure that records remain available for verifying compliance with the HPA and regulations.
- c. Both HPIs and APHIS representatives should be authorized to detain horses; the rule only allows for the latter to do so.
- d. Both APHIS representatives' and HPIs' indications of intent to inspect a horse should trigger the requirement that such horse remains present at the covered event.
- e. Requiring only APHIS-authorized inspectors is inconsistent with management's overarching legal obligations to prevent sore horses at covered events.
 - i. The rule should make clear that management choosing not to appoint an authorized person must still ensure that no sore horses are allowed to participate, and they will not be shielded from liability if soring is found by USDA.
- f. The rule should clarify whether the agency will send two representatives if more than 100 horses are entered in a covered event and if management chooses to appoint an APHIS representative.
- g. The rule should clarify its reinspection procedures, such as when no APHIS representative is present at the event.