**From:** Lesa Vold [mailto:voldl@validusservices.com]
**Sent:** Monday, December 06, 2010 7:04 PM
**To:** PSA Department
**Cc:** Earl Dotson
**Subject:** Comments regarding ExSC 8096

To Whom It May Concern:

I am submitting these comments on behalf of National Pork Producers Council (NPPC), an ASD.  In review of the proposed language in ExSC 8096 we have the following questions/comments:

      Section 2.4.3:

o        Since Annex 3 is referenced more appropriately under Section 2.5.1.3, footnote 6, is there a need for the reference to exist in section 2.4.3 Second Paragraph?  If reference is still needed in this section a suggestion would be to review third paragraph to state “Developers shall retain evidence of such efforts (as referenced in 2.5.1.3) in order to…”

o        Bulleted items in this section should be re-worked as all bullets listed as “good faith minimums” should not be required in all instances were a PINS comment or other ASD findings in preliminary review does not exist.

      Section 2.5.1.2

o        Last part of paragraph one discusses assertions of conflict/duplication along with the need of the standards project. Does the ExSC view these as one in the same?

      Section 4.3 and ANSI ExSC Operating Procedures Item 20 (a)

o        Last Paragraph.  A conflicted developer or individual commenter would not always know when the BSR-9, or BSR 109 is going to be submitted to ANSI in order to meet the timeframe outlined.  It is important to leave the timeframe open up through public comment, and even after; however, BSR proposed submittal dates are often not disclosed because they can change due to developer resources and work needs after the public comment process closes.  Is there another solution for this timeline?

Thanks for your consideration.

Lesa

Lesa Vold

Director of Management Systems

Phone: 515-278-8002

Fax: 515-278-8011

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