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American Association of  
**Grain Inspection and Weighing**  
Agencies

January 11, 2010

Mr. Randall D. Jones  
Deputy Administrator  
Federal Grain Inspection Service/GIPSA  
U.S. Department of Agriculture  
STOP 3601  
1400 Independence Ave., SW  
Washington, DC 20250-3601

Dear Mr. Jones:

As the Federal Grain Inspection Service's partner in providing official inspection and weighing services, AAGIWA members continue to have concerns about personnel issues and the status of fundamental programmatic changes now underway. We would like to continue our dialogue about these matters with you and your leadership team and write today to request an opportunity to meet with you.

The topics we would include on a meeting agenda mirror in many respects the key items addressed in the recent draft report of the Quality Roundtable.

Our major concern is personnel. We know FGIS is well aware of the impact retirements are having on the official system. I was struck by your report at the recent Advisory Committee meeting that 35 percent of current FGIS employees are eligible for retirement. At the senior level, we have seen the retirement of two key leaders in the last six months – the director of the Field Management Division and the director of the Technical Services Division. As a practical matter, we have great confidence in the individuals named to fill these roles on an acting basis and hope they have the assistance necessary to carry on both their regular position and the position they hold on an acting basis.

Our concerns on personnel really go more deeply. We are concerned about whether FGIS has sufficient qualified and capable personnel to fill the middle tier of positions as they become open through retirement. From the outside, it appears that FGIS is challenged to implement many of the new programs on the drawing board due to the lack of qualified personnel. We worry that in a worst case scenario we could face a systemic risk if volume or quality issues swell. For those of us who are long-time veterans of the inspection system, we have witnessed before what can happen when the system begins faltering.

All of us in the official system have a huge stake in preventing such a worst case scenario. But, we need to be realistic about the current situation and find a means to address any shortcomings.

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In addition to broad concerns about personnel, we have more specific questions about program areas.

1. Inspection Data Warehouse (IDW): While most, if not all, of the official agencies are now submitting data, the timeframe for completion of this initiative remains a question. We are anxious to see value generated by this program. A primary goal from an official agency perspective, was to displace the need for export grain inspection reports (EGIS) and the inspection monthly volume reports (922s and AMA reports). Reporting out of the IDW is something the agencies see as a payoff for the personnel/financial investments they made to become IDW compliant.
2. Board of Appeals and Review: The loss of experienced BAR personnel is a critical concern. Over time, the official agencies have developed a confidence and rapport with BAR members. A lack of travel funding in recent years has affected the BAR members ability to maintain these relationships and the addition of the Grain Services Laboratory (GSL) as a separate monitoring entity has further eroded confidence. The face-to-face interaction is critical to building the trust in the national standards and we urge you to consider methods to (re)build official agency/BAR/GSL interactions. Some system reporting to provide assurance of BAR/GSL alignment is also critical to the QAC system.
3. Quality Assurance and Quality Control (QAC): Among the potential benefits we hoped would flow from the implementation of the IDW was to allow FGIS to review official service provider (OSP) grade results and provide FGIS with the ability to target certain grade factors. Most agencies continue to receive monitoring numbers and send or supervise locally U.S. No. 1 grade certifications. We believe these submissions are not a good use of our time and look forward to the time when the system will be able to target the challenging samples.
4. Industry training: You are aware of some AAGIWA member concerns over industry training provided by the Board of Appeals and Review. We would like to discuss this further to see if there are parameters for this practice that would be appropriate.
5. Licensing and Inspection, Testing and Weighing (ITW): These functions in FGISOnline are still in development/testing. These business applications will complete the FGISOnline package and we are hopeful that these items can be placed into operation in the near future allowing the resources currently committed to these developments to be used to support the official system.

In closing, we would like to ask if there are ways official agencies can help in the challenges you face. Surely there are areas where we can work together that would bring mutual benefit while continuing to maintain the high quality service our customers deserve and have come to expect.

Respectfully,

A handwritten signature in black ink that reads "Larry Kitchen". The signature is written in a cursive, flowing style.

Larry Kitchen  
President