

Comments for Instrument Approval Process

- ❖ 4. Significant upgrade needs to be clearly defined with no “interpretation” available.
- ❖ 5.1.2 Again these should be definitions that are not open to “interpretation”. Language like this is too arbitrary and fluid to the individual making these assessments.
- ❖ 5.2 Instruments should be allowed to seek approval for single attributes, either YG or QG, rather than all or nothing.
- ❖ 5.3 “discretion of the USDA AMS” again not clear rules, this opens a path to indeterminate testing, state the reasons for additional testing being needed, they need to be 100% data based.
- ❖ 5.3.1.1 The Gold Standard Committee of 3 should be at least 5, then you can through out the high and low and get the mean. The reality is with the number of approved instruments we have, comparison of instrument to instrument is a far more repeatable and accurate prediction rather than comparing to a volatile panel of graders.
- ❖ 5.3.1.2 What happens if to much of the data is thrown out because the graders can’t agree? Should the equipment provider be punished for USDA AMS errors? The means and root mean square errors of the Gold Standard Committee need to be published so that the industry may know how accurate and precise the graders are.
- ❖ 5.3.1.3 The prediction equation and variables should be proprietary, no need to share the equation with USDA AMS if the scores are right.
- ❖ 5.3.1.4 When did LP become experts in imaging?
- ❖ 12.2 Conditional approval is not the path we want to go down. What field data would be needed to spur another round of testing? To ambiguous and to much leeway for USDA AMS.
- ❖ 12.3 Revisions should only be allowed as recommended by an outside party. This gives to much leeway for AMS to act out of spite.

Comments for Instrument Installation

- ❖ 1. It has not been “shown” that some instruments behave differently, there is very weak anecdotal evidence, and no true calculations were done. This is blatantly false.
- ❖ 2. This is way overstepping the USDA AMS grading purpose as a fee-based service.
- ❖ 5.1 This repeatability should not include the USDA Gold Standard Committee; they should not be involved in installations at all.
- ❖ 5.2 If there is true concern with cameras “changing” when installed run a side by side with one camera on the plant network and one off. That is a better metric of change than introducing the hugely flawed USDA Gold Standard Committee as a new variable in every installation. Then further assessments should be made using the variance report that is references in 516. This whole document is unnecessary and shows a complete lack of understanding of camera systems, software, statistics and grading in general.