

Traas, Laura M – DATCP: No, because we have up in A or other evidence. So if it's on your manifest, that's other evidence.

Thornton, Lynn: Okay, then I'm good.

Helen Schmude: So you know, as we go through and we do this right, these are the rules that at a minimum, right? The state says that we need to follow as a company. You're certainly more than willing or you can do more, right?

Traas, Laura M – DATCP: Right, yes.

Helen Schmude: So I think it's important to keep in mind that this is the minimum that the state wants to see and actually regulate. As a company, you can certainly do more to provide your assurances based on the risk that you have assigned to each one of your plants activities.

Andrew Johnson: I totally agree.

John Umhoefer: Yeah, and here's a layman's question. I'm sorry to interrupt. There's a manifest. Also have one through five. Are you generally capturing that in a manifest?

Thornton, Lynn: We don't capture the cleaning date and time on the manifest.

John Umhoefer: So the manifest, the manifest might not be a one for one acceptable alternative then?

Thornton, Lynn: Right.

Traas, Laura M – DATCP: Right, the manifest cannot replace the cleaning tag unless they add that cleaning and sanitizing and facility number and all of that to the manifest. And most folks, they're manifests are busy enough.

Andrew Johnson: But as a combination you could have all of that information between the two under other evidence, correct?

Traas, Laura M – DATCP: Absolutely. Yeah, but I've had it, you know where I've asked, you know, show me your information and I'll have three to four pieces of documentation just following that truck through its day.

John Umhoefer: Okay, as long as the combination can suffice, that's great.

Traas, Laura M – DATCP: Yep. So I believe we were on item D. Whenever the bulk milk tank operator or cleaning facility employee cleans and sanitizes a direct ship tanker, the operator employee shall apply a seal to each access port. I don't know that that needs to change at all.

Brandon Johnson: Agreed.

Andrew Johnson: Yep, that's good. Not to back up a little bit, but just for the wording on C the last sentence says that the remove tag should be retained for at least 15 days at the location where the bulk tanker was cleaned and sanitized. I mean, we have several trucks that were clean and sanitized somewhere else. Is that a verbiage thing that, I mean, should it - I'm just playing devil's advocate here - should have just say it should be removed and retained where it was unloaded as well. I'm just trying to look at that verbiage and understand not all trucks are going to deliver where they were cleaned and sanitized. Or am I reading it wrong?

Traas, Laura M – DATCP: No you're reading it right, I'm just trying to think of the different words we can use.

Brandon Johnson: Why wouldn't it just be at the location where the bulk milk tanker was unloaded?

Traas, Laura M – DATCP: Because it does need to stay with the truck until it's next cleaned and sanitized. So if you have a truck that gets unloaded and then goes out to pick up something else before the 24 hours are up that they need tag needs to follow that truck through its 24 hours. So I'm thinking of, you know, needs to be retained for at least 15 days at the location where the bulk milk tanker was next cleaned and sanitized.

Andrew Johnson: No, you're on the right, right track. The way I'm thinking is, you know, once you replace once you wash that truck, you're starting over with the evidence. So, but the old evidence is what we're looking at retaining for 15 days.

Traas, Laura M – DATCP: Right.

Thornton, Lynn: Or what about verbiage of where the bulk milk tanker has its next cleaning and sanitizing.

Brandon Johnson: I'm just thinking in this situation so and maybe this is me, just not understanding so, maybe I should be quiet but in the situation where a hauler is going to pick up more milk and doesn't

need it washed, they could communicate that to the plant. I yeah, I see what you're saying, yeah. I was only thinking of the situation that I was envisioning, Andy said, whereas a milk plant unloads a truck but they're not where it gets washed. It goes somewhere else and gets washed and that situation, I think it should stay with the place where the milk was unloaded. But I see what you're saying. I don't have any conflict then.

Traas, Laura M – DATCP: Okay, we have been at this an hour and we've gotten through one paragraph, but I knew these ones were going to be tougher. Okay, so we get into paragraph six, which talks about the bulk milk tanker cleaning facility. No person may operate a bulk milk tanker cleaning facility to clean grade a bulk milk tankers unless the person holds valid grade a permit from the department for that facility. Permit is not transferable now. This is where we get into the only grade A stuff again. Person shall apply for create a permit under part A on the form provided by the department. The application shall include the name, address, telephone number, address of the cleaning facility, including the street address and post office, and county and other information that the department reasonably requires for purposes of issuing a grading permit. Any issues so far?

Thornton, Lynn: Laura, this is probably a stupid question, but so the 54 permitted wash stations, are you considering them a grade a permitted facility or not?

Traas, Laura M – DATCP: Yes, they are a grade a bulk milk tank wash facility. So the only thing they can do in the graduate program is wash.

Thornton, Lynn: So they would fall into this.

Traas, Laura M – DATCP: Yes.

John Umhoefer: Laura, is there a reason those one, two and three are needed and B, you just say on a form provided by the department.

Traas, Laura M – DATCP: I don't know. I'll have to ask our rules expert if there's a reason that we have to spell this stuff out in rule. There might be a reason we have to spell stuff out in rule because I know when we've gotten into dealing with some of the sovereign citizen people that they've, they've said if it's not in rule, I don't have to provide it to you and it's like well it's really kind of hard to find your location if you don't provide me an address.

John Umhoefer: Okay, that could be the reason.

Helen Schmude: So for be there, right, a person shall apply for a grade A permit under part A on an application provided by the department. If you use the word application right, you need to fill out the

mailing address, the physical location. All that information's already requested and on that form. So then do you need to, you know, reiterate it here because you could update your application as needed and it would still contain all this information?

Traas, Laura M – DATCP: Okay, so I've got that marked as Andrea Northwood is our rules guru, so I will ask her if this is required based on the fact that I see it in all of our rules, I'm thinking there's something that says we have to spell this out. Item C the department shall grant or deny within 40 days after the department receives a completed application. And in order for the bulk milk tank cleaning facility to hold that valid permit, they have to do a semi annual inspection by the department. Anything on that paragraph? Now we're going to get into another tough one. And this one we might want to carry over until the next meeting, since none of our inline sampler folks could be on this call, but we can at least start on it. But I will make a note. If milk from a grade A or grade B farm violates any standard under 65.70 on any single test, milk from that farm shall be collected at least once every two days until a subsequent test shows that the milk from that dairy farm complies with the standard. Now, ATCP 65.70 says that if you have a high plate count that you cannot extend the frequency of pickup, you have to pick up the milk from that farm every two days. Now the thing that confuses me about 65.70 is it also says if the somatic cell exceeds standards and so I question do we really need to pick up the milk every two days if the somatic cell is outside of acceptable ranges?

Andrew Johnson: This is Andy. I'll comment on that. I think obviously more frequent pickups is not going to help change the cell count, but it provides documentation that the guys trying to lower the cell count. You know you're not going to get a sample and you know every four days or whatever, it's not showing and I'm struggling with my words a little, but you're not collecting data showing that he's trying, unless of course the field man goes out and pulls a sample in between pickups and can provide that. But the pickup sample is going to show that he's trying to get it down. So I guess my personal opinion is that I wouldn't change it. I mean, if he's having trouble with his cell count like that, he probably wants to know if what he's doing is working or not, you know sooner than later as well. So I don't think it's a big deal that you know, obviously the science isn't going to show that picking up more often is going to change it. But if he's aware of it and he's trying some things, picking it up more often and it's going to help him provide information that it's working or not. So I don't think it's a big deal to leave it.

Traas, Laura M – DATCP: Other thoughts? And so following along the concept up here of every two days, it is the dairy plant operators responsibility to notify the farm and the hauler whenever the milk from that farm must be collected more frequently than every two day pickup. And then the last sentence of that line says that no dairy plant operator may receive milk collected in violation of part A. So to be clear, what that means is, if you have a farm that has a high plate count and should be on once every two day pick up and it was not picked up every two days or was picked up every third day, the dairy plant then is in violation of this rule.

Thornton, Lynn: Is there a lot of milk that only gets picked up every three days?

Traas, Laura M – DATCP: No, there's very little that's picked up every three days. I would say most of

what I see that it's being picked up every third or fourth day is canned milk in the winter. They're not going to let canned milk set three to four days in the summer, but in the winter you might see canned milk go three to four days.

Thornton, Lynn: So then this would have in this rule of two days, would be forcing those canned producers to be picked up every two days in the winter potentially right?

Traas, Laura M – DATCP: Correct, yes.

Thornton, Lynn: Is that a hardship? I mean, do we? I just don't have any knowledge of this, so do we feel like it would be? It's a hardship for some of them.

Andrew Johnson: I don't think it's a hardship. I think it just it makes the farm meet the standards. If they're not meeting the standards, I mean it can be done, but if the farms not meeting the standards, then he has to get picked up more frequent. I mean it, it forces the farm to try to meet the standards, you know, do a better job of cooling or cleaning and all that kind of stuff. So I wouldn't go under the hardship thing. I think it just helps the plant make sure that the farms are doing everything they can to meet the standards.

Thornton, Lynn: So if they're out of standard on plate count, this definitely plate count can be affected by that three day pickup, right? But I think to Laura's point, the cell count not really going to be affected by two day pickup versus three. Although we have to test official cell counts within three days of pickup too, right?

Traas, Laura M – DATCP: Yes, unless you preserved the samples.

Thornton, Lynn: Yeah, I guess I can see that the plate count is definitely should be two days, but I guess I just, I agree with Laura. Like cell count doesn't matter whether it's two days or three days from a food safety standpoint, I'm guessing it doesn't really matter.

Helen Schmude: But I think we need to take a look at exactly what 65.70 addresses. If it addresses somatic cell and plate count in the same rule, how do you pick one over the other?

Traas, Laura M – DATCP: Well, what we can do is say if a Grade A or Grade B dairy farm violates the standard under statute, ATCP 65.70(a)(2), which would specify bacteria count because somatic cell count is (a)(4).

Andrew Johnson: I'm okay with that if that's what we want to do.

Traas, Laura M – DATCP: The other thing to keep in mind is for the Grade B farmers, which is this, which are the ones that more likely are going to be picked up every three to four days, their bacteria count is 300,000. But the somatic cell count is the same for A&B. Somatic cell count has 750 per mil for both A&B, so we can move this one over because as I said, we're going to start at 82.10 next meeting and hopefully we can have the inline sampler folks here. So then we get into the one other sections that's going to change radically. Supplies required for milk collection and sampling. The bulk milk weigher and sampler who collects milk in bulk shall have the following supplies available, and adequate supply of sample containers. I believe that applies whether you're using an inline sampler or a dipper. Any concerns about 2A? 2B is where things get fun, because if you're using an inline sampler, you do not need a sample dipper.

Andrew Johnson: Did you change that? And then that creates more opportunity for that for the inline sampling.

Traas, Laura M – DATCP: One thought that ran through my mind was B and C both only apply to dippers. Do we make just a subsection that says if you are sampling from a - I don't want to call it a traditional bulk tank - but have some definition of if you are collecting from a bulk tank where you can pull the sample from the top of the bulk tank in the milk house, you need a sample dipper and you need a sanitizing solution. If you are using an inline sampler, you need the equipment as outlined by the manufacturer of the inline sampler.

Andrew Johnson: It's kind of using bulk tank. Could you use the word vessel? Maybe we, you know, to address the samples that are being taken at the intake from direct load tankers.

Thornton, Lynn: There are also sample straws and I know that probably haulers don't use them much, but as field reps go out, maybe to check and collect an official sample, we use straws that are already sanitary. Which would, if you change that to a sampling device, it would fit. But the straws then we don't have to sanitize them. They're packaged sterility.

Traas, Laura M – DATCP: Okay. So what I did here, this is going to take some work. Sample device to collect samples under 82.12. If using a sample dipper, it shall be kept in a sample dipper well designed for that purpose, and the sample Dipper well shall contain a sanitizing solution of not less than 100 parts per million, or more than 200 parts per million chlorine or equivalent. The bulk milk weigher sampler shall carry a sanitizer solution test kit to test the strength. That's a sanitizing solution. And then we need to include something, are all sampling straws always, do they always come pre-sterilized or can you buy reusable sampling straws?

Thornton, Lynn: I've never seen ones you can reuse that come in a tube. The plastic ones that we use I've never seen reusable ones.

John Umhoefer: Laura, doesn't this make you just want to say any sampling device should be kept clean and sanitized? Period not have any of this.

Traas, Laura M – DATCP: Yeah. And that's kind of what I'm going to do here. So I added a four, if using automatic sampling device, it shall be used and maintained according to manufacturer instructions.

John Umhoefer: Could put one and two together.

Thornton, Lynn: This paragraphs really talking about the supplies we need, though. Also, should you add in there supplies needed according to manufacturers instructions also.

Traas, Laura M – DATCP: You're right. Okay, so if using an automatic sampling device development, where and sampler shall have yes, the supplies needed as directed by the manufacturer's instructions.

Tony Lampman: I have a question about that. I mean, shouldn't we leave it in there that it has to have the dipper with sanitizing solution? You know, because if the inline sanitizer or the inline sampler failed, then there wouldn't be a way to sample. You know, there's always chances of things failing or it's good to have that back up, you know, manual.

Traas, Laura M – DATCP: Well, the issue we're running into is we're starting to talk about silos that cannot be sampled or direct ship loads. And so the bulk milk weigher and sampler who picks up the milk may not be able to sample at all if the inline sampler isn't working. And then they will have to go to the plant and the plant will have to sample the tank when it gets there. So I don't know that having the dipper as a backup is something that we want to mandate because as we move into these newer technologies, we're going to require them to have a piece of equipment that they can never use.

Tony Lampman: So in that case, if so, if you had a load that was bad and you weren't able to find out because usually you have the farm samples and you could see what which farm caused that load to be bad, then that farm would have to be cleared again before it could be picked up. But now we don't know, I mean, how do we find out which farm? You know, because sometimes we have 11 farms. It's kind of hard to go out and sample every farm before we can pick up that load again.

Thornton, Lynn: So Tony, it sounds like you're talking about an inline sampler that would be installed on a truck like so you're picking up comingled samples and it's an inline sampler installed on the truck. Is that kind of what you're talking about?

Tony Lampman: Yeah, I'm not talking on the farm in line sampler. I'm talking like the Piper system where they have it mounted in a truck.

Thornton, Lynn: I haven't looked at that like on a truck, but I'm just assuming that the hauler driving the truck as he starts pumping that milk on, he has to ensure that that sample is being taken appropriately and that if he sees he is not getting a sample as he starts pumping on that he would be required to stop somehow to make sure that that he is getting that sample.

Tony Lampman: Right. But then we'd run into hardship problems where we can't get that milk picked up and it's a, you know, we're like a lot of haulers. They do a lot of miles where they can't just run back and get a different truck with a different. I just wondered if we kept the manual dipper on there, they're, you know, just like with electronic, I mean not to change the subject, but like electronic logs for, for haulers, they have to have a backup. And also if that fails, they have to be able to.

Traas, Laura M – DATCP: Yeah, the issue I'm having here is walking the line between what do we mandate versus what is good operating practice. For me, from the regulatory side, I'm looking at it and saying all I can mandate is that they have a sampling device. I don't know that I can say that if you've got an automatic sampling device, you still need the dipper as a backup.

Helen Schmude: So I'd like to ask a question to those who have and inline sampling devices on a truck, right? If you're not picking up a full load, why would you even use that and not pick up or not sample individual farms through the ball tank so you can, you know, do all your procedures? Because obviously if the milk is spoiled, you don't even want to put it on the truck.

Traas, Laura M – DATCP: So what I don't know that there are any truck mounted samplers in this state at this time. I've seen them in operation in other states and other countries. What they do is one of the advantages of the inline truck mounted samplers is the hauler does not have to wait for the tank to agitate before they start pulling their sample, because the set sampler is supposed to pull a small draw through the entire pumping of that load from that that farm. And so what they normally do to check the milk before they start loading is they will do a short drop, pull it, pull some sample in, pull that into a vial and do their sniff test there. It's a radical shift from how we do things because we are so used to going and turning on the agitator, looking at the milk, smelling the milk. That's something we're going to have to discuss.

Helen Schmude: So from a regulatory perspective then, if I'm a hauler and I pick up six farms, right, and I use this inline sampler and then I get to the dairy plant and they say no, I refuse this load because the acidity shows you have spoiled milk in your truck, who pays the farms and who disposes of the milk then?

Andrew Johnson: And I take that one step further. You know, if you have six stops on a load and you have an antibiotic load you know now you've got, are you really getting the representative sample from that inline sampler? Now you're going to have two guys that are going to show up positive, and you

need to clear both of them. And maybe it was only one of them. There's a lot of questions I think for that.

Traas, Laura M – DATCP: Ah, on that topic, I can speak to New York has had very good success with the truck mounted in line samplers that they have been using, clearing the lines between farmers so that one farmer's milk does not get contaminated with another farmer's milk.

Thornton, Lynn: I think one of the big selling points of the inline samplers for these trucks is eliminating shrink. You take all the people factor of measuring that milk out and it's good for the plants. You probably eliminate a lot of shrink.

Traas, Laura M – DATCP: So as I said, we're going to come back to this one next meeting, but right now do we think we've got at least a base to cover the different types of sampling devices that might be used to collect a sample?

Andrew Johnson: I think it's a really good start.

Traas, Laura M – DATCP: Yeah, let's look at the other equipment, an insulated carrying case with rack to hold the samples while carrying. The carrying case shall comply with 82.12. We'll get to that in a bit. A dial or digital thermometer calibrated for accuracy against the thermometer traceable to NIST certified thermometer at least every six months, accurate to ± 2 degrees Fahrenheit what can be used to check the accuracy of the farm. Bulk tank indicating thermometers. This is another one that I am not sure how we are going to handle this if we have a silo that the hauler cannot access in any way. Then how do you check the temperature of the silo?

Andrew Johnson: Well, I think if we go up to the above, it says that they're available, not necessarily that you have to use them. You know, if a silo is required to have a temperature chart recorder of some sort, whether it's electronic or a paper one, that they can use, that's been calibrated by the field rep basically, I mean, it's not necessary that all these things are going to have to be used, but they're that they're available. You know if that recording device is not working and, you know, somehow they want to be able to make sure that that milk is cold. I mean, first thing they do obviously is called the field rep or the farm. But I think if we focus on that these are items that should be available. I'm not necessarily sure that they have to be using them every time depending on the situation, but I think you know any bulk mouth way or should have a thermometer just in case.

Traas, Laura M – DATCP: Okay. Marking device to identify the samples. And that includes labels label that's marking device or other timing device. An adequate supply of forms in a writing device to prepare milk collection records. Here we go again. What if, and I've seen this also, what if they're all electronic? I've seen bulk milk weigher and samplers that come into the milk house pull out their iPhone, record what farm they're at or the iPhone has location detection. It says you're at this farm and her card, the

temperature of the bulk tank record the weight of the bulk tank. Do we need to say anything here with regard to supply of forms and writing devices?

Brandon Johnson: Should it just be changed to state that there needs to be a way to record the necessary information for the milk collection records? And do away with the supply of forms and a writing device.

Thornton, Lynn: I was going to say the same thing.

Traas, Laura M – DATCP: So I got rid of the adequate supply of forms in a writing device and just said an acceptable method to prepare milk collection records under sub 10.

Brandon Johnson: Yes.

Thornton, Lynn: I wonder if under G the other timing device you need to add something in there when bulk tank agitation is required to be timed or something like that.

John Umhoefer: All of these are supplies that refer to another section, basically.

Traas, Laura M – DATCP: Yes.

John Umhoefer: And so I don't think we need to repeat every time what they're for because it's really just referencing the supplies you need to do something somewhere else in this chapter. But to that point I don't think you need to change at all if you tell them they have to collect records. They have to collect records, whether it's a pen and paper or a iPad. You're demanding they collect records so they have to do it, and basically you're saying you do it any way you want. So you're sort of saying nothing. And acceptable method will be probably be questioned by the legal saying that's unclear.

Brandon Johnson: I like that a lot, John, but that makes sense. Removing it if it's possible, I agree.

Traas, Laura M – DATCP: And then there's this next one, an adequate supply of single use single service paper towels.

Helen Schmude: Why does the hauler need to supply single use paper towels when they should be available at the farm?

Traas, Laura M – DATCP: Okay, so we've gotten through item two and as I said, we're going to go back through items one and two.

Mick Homb: Laura, on where it said about the thermometers and stuff, and am I so out of touch? Do ball tanks that are going to be put on the farms that are already in the plants, don't they have petcocks? So then my question is if you take a sample out of your bulk tank out of the petcock, is that milk acceptable to do an antibiotic test or a thermometer check? Or is it not?

Traas, Laura M – DATCP: As long as the tank or the silo has been properly agitated, you would be able to get an acceptable drug residue or temperature record.

Mick Homb: And what does that limit? What does that limit for time of agitation? 20 minutes?

Traas, Laura M – DATCP: Well, there again that would be determined by the manufacturer of that tank.

Mick Homb: It was just a question I haven't done in a plant in a long time.

Traas, Laura M – DATCP: Yeah, most plants, they're agitators, are just running at a, you know, a minimum speed constantly just to keep the milk in the tank constantly. So yeah, that's one of those things we're going to have to look at is do we require in rule once we start talking about silos on a farm. And that's ATCP 65, which is probably not going to be open for three to five years. But do we look at when we get to 65 saying that if you're going to put a silo on the farm that it needs to have a sample clock on it? But we are at 10:51. We are at something of a stopping point because we've gotten through paragraph 2. So I'll ask: what do we want to do as far as a next meeting date as we are getting close to the holidays? So let me pull up the calendar. So we are here at the 7th. I cannot do anything the week of the 14th as we have our dairy section meeting next week. Probably shouldn't have said that, cause now you'll know that hey, there aren't going to be any sanitarians out for a couple of days. The 21st is Thanksgiving Week, which is also a hunting season week.

Brandon Johnson: I could do the morning of the 21st, but maybe that doesn't work with everyone else.

Traas, Laura M – DATCP: I suspect there at least a few hunters in this group.

Mick Homb: I'm okay with the 21st.

Thornton, Lynn: I'm okay with it.

Tony Lampman: I'm good with it.

Helen Schmude: Works for me.

Andrew Johnson: That'll work for me.

John Umhoefer: Before three, OK.

Traas, Laura M – DATCP: Oh yeah, that would be the next thing we need to talk about. And because we would be hoping to get our guests from Ireland on the call, they would probably prefer it be 9:00 o'clock in the morning again.

Brandon Johnson: Yeah, I needed to be in the morning 9:00 o'clock would be great.

Helen Schmude: That works for me.

Mick Homb: Me too.

Traas, Laura M – DATCP: Okay. So Max, I will ask you to do your open meeting magic again to formally announce that the ATCP 82 group will be meeting. Tuesday, November 21, at 9:00 a.m. Central Standard Time so that the folks from Ireland and hopefully at least one of them will be able to make it. Any last comments, concerns. Oh, I want to go back and look at this section kinds of things.

Brandon Johnson: I just have a comment that I think it was great we covered, I feel like even though it didn't seem like we covered a lot, we I feel like we did.

Traas, Laura M – DATCP: Yeah, we covered some very difficult sections and now the we got the one section completely done. We got another section where we started laying some base work. The next thing we're going to get into, and I'll forward you all that, we're going to get into talking about the bulk milk weigher and samplers and who needs to be a licensed bulk milk weigher and sampler. Everyone on the farm who touches an inline sampling device need to be a licensed bulk weigher and sampler because the test they would take has nothing to do with what they do in real life on the farm. And that's going to be a major topic of discussion of are we going to require to be about bulk milk weigher and sampler when they're pulling a sample from a device that has been set up by the farmer?

Brandon Johnson: Laura, I am curious if you're saying New York has had good success with the inline samplers. I'm just curious. Do they have that situation? And if they do, what have they determined? And maybe you don't know that. I'm just curious.

Traas, Laura M – DATCP: I've talked with Casey McHugh and Chris, pretty extensively on these inline samplers. What they are doing is they are not requiring the farm employee who takes the needle out of

the aseptic package and sticks it into the septum to be a licensed bulk milk weigher and sampler. This goes against all of the FDA M-I's with regard to inline samplers. All of the FDA M-I's say everyone who handles any part of this inline sampler must be a licensed bulk milk weigher and sampler. New York is not doing that. What New York is saying is there needs to be some folks on the farm who are licensed bulk milk weigher and samplers who come in and check to make sure that the device is set up properly and then either the farmer who is probably going to be one of those licensed bulk milk weigher and samplers or the licensed bulk milk weigher and sampler who comes to the farm to pick up the milk is going to take some of these have a large one liter, 2 liter bag is going to agitate that bag and pull the samples they need to be a licensed bulk milk weigher and sampler. But, you know, as far as, you know, who puts the the needle into the septum at the start of milking, this is mostly direct ship loads right now, they are not saying that those people need to be permitted as bulk milk weigher and samplers and they have not had major problems with their survey enforcement scores and that's one of the things that I've got the MSRO's digging into right now is how it impacted our enforcement scores because we've already been told by our milk specialist that they will enforce the requirement that everyone who handles that device is to be licensed. And so how will that impact our enforcement scores and will that cause a problem for the entire dairy industry and a whole as a whole if our enforcement score is start failing because we're not enforcing that part of the FDA rule?

Brandon Johnson: Okay, wow, there's a lot there. Thank you.

Traas, Laura M – DATCP: So I'm hoping that on in at the next meeting or the meeting after that, I will be able to come back with some data that says and what I'm hearing right now is that it should not be a problem for our multi farm BTU's, but it may be a problem for a single farm BTU.

John Umhoefer: Laura, do you think there's any stomach at the NCIMS to kind of lead this instead of follow the PMO and get two big states moving in one direction?

Traas, Laura M – DATCP: Well, let's put it this way. Casey McHugh is currently the chair of the NCIMS Executive Board. So does that tell you if there's stomach? There is definitely stomach there to bring the NCIMS into the 21st century. The problem is they would either need to do a mid conference special meeting or we'll have to wait until after the 2025 conference and just take our licks in the meantime.

John Umhoefer: Well, these rules take two years anyway. So timing is everything.

Brandon Johnson: I have to leave for another meeting.

Traas, Laura M – DATCP: Okay. Thanks, Brandon. Anyone else have anything else? It is a one minute after 11:00 o'clock. Thank you all very much and we'll talk to you again in two weeks.