December 12, 2022

Ivan Hankins, Chair of the NTEP Committee
Re: TSI/DICKEY-john position on adding VCAP requirements to Grain Moisture Analyzers

Mr. Hankins,

As you know, the DICKEY-john branded grain moisture testers have been a pillar in the grain moisture measuring NTEP program for decades, and for many years, the GAC 2100 was the standard in the United States for grain moisture testing. The DICKEY-john name is synonymous with reliable grain moisture analysis in the United States. We have reviewed this proposal, and with this letter, we are making a formal response to this proposal that would have a direct impact on our business interests.

TSI/DICKEY-john is writing to comment on item ADM 21-1, which is the proposal to add grain analyzers to the list of devices required to comply with the NTEP Verified Conformity Assessment Program (VCAP). The annual Grain Analyzer sector meeting held in August 2022 was the first time that this item was brought to the attention of the sector, and we were asked to comment on the proposal. Since then, we have reviewed the VCAP requirements as well as participated in a webinar with Darrell Flocken to better understand the process.

In reviewing the VCAP audit requirements, it is apparent that this audit program has been based on audit systems that are commonly found within ISO 9001 certified quality management systems. Since TSI/DICKEY-john already has a quality system that is certified to the requirements of ISO 9001 by an independent 3rd party, and has been continuously since 1993, we feel that the VCAP audit requirements are redundant.

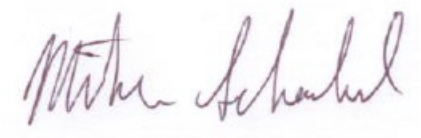
In addition, since grain moisture meters that are legal for trade in the United States are required to participate in the NTEP Phase II program, the grain files that are used to create individual calibrations are checked throughout the year by FGIS, and updated annually as needed when performance deviates from acceptable tolerances found in Pub 14 and Handbook 44.

Finally, all new instruments that are manufactured are compared to Lab Standards that are traceable to the Master Standards that are located at FGIS labs in Kansas City, Missouri. These instruments are compared to the FGIS standards twice per year, as scheduled and managed by FGIS.

Therefore, since the production of equipment, and the maintenance of the grain calibration files are so closely controlled throughout the year via FGIS, under the umbrella of the USDA, TSI/DICKEY-john is in opposition to this proposal due to our assertion that the VCAP program would not add to the controls that are already in place for grain moisture analyzers.

We appreciate the opportunity to submit these comments.

Sincerely,



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