

From: Terrance.Arthur@ars.usda.gov
Sent: Thursday, September 04, 2008 3:39 PM
To: FSIS GuidanceDocumentComments
Subject: Message from Internet User - Draft Compliance Guideline for
Sampling Beef Trimmings for Escherichia coli O157:H7

To whom it may concern,

Our group published the article referenced on page 5 of the guideline. We have looked at the draft guideline and noticed three issues that should be clarified. 1) The draft guideline erroneously states the APC relationship with E. coli O157:H7 in the wrong direction suggesting that increasing the APC will lower the E. coli O157:H7 levels. 2) as written it could be interpreted that an APC level of 4 is a specific breakpoint of some kind. However, in our study the APC level of 4 was an arbitrary number chosen for the analysis because it best fit the data from that study but likely is specific to the plants and time interval of the study. The intent of that analysis was to show that if plants could work to lower their APC or EBC levels on a sustained basis, then they likely would be lowering their E. coli O157:H7 levels as well, but if you tried to apply this approach to another dataset, the appropriate breakpoint may or may not turn out to be APC of 4 logs. 3), the citation for the article is incorrect. The author's initials are T. M. not T. A. and the page numbers should be 658-665. Thank you for attention to these items.