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May 29, 2015

Mr. Steve Porter
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, VA 22302

Re: Federal Register/Vol. 80, No. 61, Proposed Collection of Information for the Development and Maintenance of a National Universal Product Code (NUPC) Database

Dear Mr. Porter:

The Electronic Funds Transfer Association (EFTA) is submitting the following comments in response to the above-captioned Notice published March 31, 2015 in the Federal Register.

EFTA, the history of which spans nearly 40 years, is a non-profit professional association that through education, outreach and advocacy promotes the adoption of electronic payments and commerce. EFTA was an early and strong proponent of using electronic benefits technology in the SNAP and WIC programs. Throughout our long history we have worked in close partnership with FNS.

EFTA and its eGovernment Payments Council (eGPC), whose members include EBT processors, financial institutions, technical consultants that work with state agencies, equipment and card manufacturers, and a number of state agencies responsible for the delivery of food benefits via EBT, applaud FNS on its efforts to convert WIC paper coupons to EBT. We strongly support the implementation of a NUPC database as it enhances the rollout and operations of WIC EBT.

A number of our eGPC members have reviewed the Notice and offer the following comments on the four items raised regarding the collection and maintenance of information for the NUPC database.

(a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility

Comments: The information/data collected does have practical utility in the authorization and delivery of WIC EBT. Having FNS obtain the data, as opposed to the individual State agencies, should provide an effective and efficient method of collecting and maintaining the data.

(b) The accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions that were used

Comments: We believe the estimate of the burden on food manufacturers, distributors and authorized vendors as presented in the Notice is a responsible estimate.

(c) Ways to enhance the quality, utility, and clarity of the information to be collected


Comments: We believe the approach to obtain the data directly from the manufacturers is the most effective way to receive valid data.

(d) Ways to minimize the burden of the collection of information on those who are to respond, including use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology

Comments: We recommend that the NUPC allow for respondents to provide updates electronically, by either uploading data or entering data through a web application.

On behalf of the members of the Electronic Funds Transfer Association and its eGovernment Payments Council, we appreciate the opportunity to comment on the proposed collection and maintenance of the NUPC database.

Sincerely,

A handwritten signature in black ink, appearing to read "Kurt Helwig". The signature is stylized with a large, circular initial "K" and a long, sweeping underline.

Kurt Helwig
President & CEO