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July 7, 2015

Sarah Simpson, JD
Director of Legal Affairs, Licensing and Enforcement
Indiana Board of Animal Health
Discovery Hall, Suite 100
1202 East 38th Street
Indianapolis, IN 46205

Dear Ms. Simpson,

Pursuant to IC 4-22, the Indiana Office of Small Business and Entrepreneurship ("OSBE") has reviewed the economic impact analysis for small business associated with rule changes contained in LSA Document 15-152 proposed by the Indiana Board of Animal Health ("IBAH"). The proposed rule amends 345 IAC 2-6 governing cattle brucellosis control and eradication. The proposed rule will confirm the Indiana State Board of Animal Health's rules to the recently amended United States Department of Agriculture – Animal and Plant Health Inspection Service (APHIS) requirements at 9 CFR Part 78.1 governing the testing and certification for brucellosis class-free states and certified brucellosis-free hands. The proposed rule also amends 345 IAC 2-6 to align certain definitions with the federal brucellosis regulations and change the age of cattle to be included in a herd blood test for purposes of establishing and maintaining a certified brucellosis-free herd. It also amends 345 IAC 2-6 to authorize the state veterinarian to approve alternate brucellosis milk testing protocols in order to certify and maintain a dairy herd as brucellosis-free. The proposed rule makes other updates and amendments to the cattle brucellosis control rule.

The economic impact statement prepared by IBAH states the rule does not increase compliance costs for regulated entities. Rather, by amending current requirements, it has the potential to lower compliance costs for cattle owners. OSBE does not object to the economic impact to small business associated with the proposed rule. If you have any questions about the comments contained herein please contact me at 232.5679 or ombudsman@osbe.in.gov.

Regards,

A handwritten signature in black ink that reads "Erik Scheub". The signature is written in a cursive style.

Erik Scheub