



**Food Marketing Institute Feedback:**  
**Request for Information on National UPC Database for WIC**

Thank you very much for the opportunity to provide feedback on the development the National UPC database for WIC.

By way of background, the Food Marketing Institute (FMI) conducts programs in public affairs, food safety, research, education and industry relations on behalf of its 1,500 member companies — food retailers and wholesalers — in the United States and around the world. FMI's U.S. members operate approximately 26,000 retail food stores and 14,000 pharmacies. Their combined annual sales volume of \$680 billion represents three-quarters of all retail food store sales in the United States. FMI's retail membership is composed of large multi-store chains, regional firms and independent supermarkets. FMI's associate members include the supplier partners of its retail and wholesale members.

Please do not hesitate to contact Liz Garner at 202-220-0630 or at [egarner@fmi.org](mailto:egarner@fmi.org) for any additional information or to discuss these comments.

**2.0 Questions related to development of an automated Clearinghouse for APL files**

- a) At this time, we would support the NUPC as either an enhancement to the UPC database or a standalone dependent upon two factors: 1) the ability to standardize the products list in the event the NUPC became an enhancement; and 2) the ability of retailers and suppliers to input products into the database.
  
- b) At a minimum, a vendor ID could serve as a user validation tool, but we would recommend consideration of a stronger standard for individuals who have the ability to edit or add submissions to the database.
  
- e) We strongly believe that over 99% availability is critical, but the need for redundancy will depend highly on the expectations and accountability of when and how often changes in the system need to be made. For example, if a product is errantly included in the UPC database product list, how long will a retailer have to make sure once it is deleted from the database, that it will be deleted from the retailer's files? If the turnaround time on removing the product from the approved items list is very short, then redundancy may need to be required.

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### **3.0 Questions related to the operation and maintenance of the NUPC database**

c) We believe that standard entry requirements, or a way to convert entries to a standard format, should be set for all products entered into the database. Standardization of the type of file and fields available in the file is critical to the retail community, especially multi-state operators.

We believe this is a critical component regardless of how the APL files are pulled (or eventually pushed out) because even if the APL files are pulled separately for individual states, managing the files will be easier if they are all in the same format. We would recommend the inclusion of subcategory data, quantity, and to the extent it is necessary, item level pricing in the data fields.

e) To the extent the NUPC database may one day serve as a central repository for all WIC approved items from which state agencies may rely on to flag products for approval in their states, the database will likely contain a large number of private brands. To the extent item level pricing or other potentially sensitive information must be included in the NUPC database, we would generally recommend considering restricting public access to certain fields or tables.

### **4.0 Questions related to the development of enhancements to the NUPC database**

a) We believe completeness and reliability of information in the NUPC database is critical, and would support further utilization of technologies, such as “RedLaser” to help reduce human data input error.

Thank you again for the opportunity to provide feedback.

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