

TABLE 28.—ANNUAL TOTAL COSTS, OPTION 13

	Mean	Low	High	Average Mean Cost per Firm
Year 1	\$442,970,000	\$405,800,000	\$484,402,000	\$445
Year 2	\$2,692,790,000	\$2,504,068,000	\$2,921,375,000	\$2,706
Year 3 and later years	\$6,743,086,000	\$6,702,239,000	\$6,726,422,000	\$6,748

TABLE 29.—DISCOUNTED ANNUAL COSTS, PRESENT VALUE, AND MARGINAL SAVINGS: OPTION 13 (NUMBERS IN PARENTHESES ARE NEGATIVE)

	Discounted Annual Costs: Option 13	Marginal Savings of Option 13 With Respect to Option 4
Year 1	\$442,970,000	(\$183,745,000)
Year 2	\$2,516,626,000	(\$1,901,433,000)
Year 3	\$5,889,672,000	(\$5,630,368,000)
Year 4	\$5,504,367,000	(\$5,262,026,000)
Year 5	\$5,144,268,000	(\$4,917,781,000)
Year 6	\$4,807,727,000	(\$4,596,057,000)
: ¹	:	:
:	:	:
Year 15	\$2,615,085,000	(\$2,499,951,000)
:	:	:
:	:	:
Year 30	\$947,827,000	(\$906,097,000)
:	:	:
:	:	:
Present Value as of Year 1	\$92,987,447,000	(\$88,149,370,000)

¹ Each cell that contains only the symbol ":" is meant to convey the continuation of the series depicted in the cells that precede it from above.

Marginal analysis: As a way of comparing the options, Table 30 of this document presents the present values of total costs and the marginal savings of each option compared with option 4. Option 4 was chosen for comparison since it differs by only one provision from almost all the other options considered in the analysis. The marginal savings for all options, except options 2 and 13, are either zero or positive reflecting either a lower total cost or equivalent total cost compared with option 4.

Since option 3 and options 5–12 involve a single modification of the requirements in option 4, the marginal savings expressed for each of those options reflects the cost savings from removing that requirement. Furthermore, while option 2 differs from option 4 by two provisions, rather than one provision (option 4 does not require persons that manufacture, process, pack, hold, receive, distribute, transport, or import outer food packaging to keep records and does not require persons that are required to keep

records on foods to keep records on the food's outer packaging), the costs computed for both options are equivalent. As a result, there is no loss in meaning by comparing the costs of all options to option 4 in Table 30. Consequently, for option 10, the marginal savings in present value terms from relaxing the comprehensive foreign coverage requirement in option 4 to the reduced level of coverage specified by the registration rule is \$1,873,357,000 as reported in the following table.

TABLE 30.—PRESENT VALUE AND MARGINAL SAVINGS WITH RESPECT TO OPTION 4

Option	Present Value of Total Cost	Marginal Savings With Respect to Option 4	Description of Option Requirements
2	\$5,663,484,000	(\$129,319,000) ¹	Comprehensive coverage, 4 or 8 hour records-access requirement, 1 and 2-year records-retention requirement