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Fresh Products Branch
Fruit & Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Room 1661 South Building, Stop 0240
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Dear Ms. Emery:

Re: United States Standards for Grades of Potatoes
Docket # FV-06-303, Fed. Reg. Vol. 71, No. 184, 09/22/06, page 55356-55367

The North American Perishable Agricultural Receivers (NAPAR) is a national trade association located in Washington, DC, representing independent produce wholesale receivers. NAPAR members are predominantly small businesses with combined annual sales in excess of \$4 billion. NAPAR formed an operating alliance with the Food Marketing Institute in 1999, enabling it to function independently while expanding the services to its members.

On behalf of our members, I appreciate the opportunity to submit comments to USDA and hope our perspective is helpful in determining if there is a need to proceed with a revision to the U.S. Grade Standard for Potatoes.

NAPAR surveyed its members, soliciting their input on the probable impact these changes would have on their business operations. The responding members, while respectful of the years of work that went into the proposed rule, were overwhelmingly opposed to many of the proposed changes. They particularly felt the proposed En Route and Destination tolerances impact receivers negatively. These changes will dilute the grade standard and result in lesser quality product in the marketplace.

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The summary paragraph of the proposed rule states “The purpose for this revision is to update and revise the standards to more accurately represent today’s marketing practices.” Our members believe these changes accomplish just the opposite of the stated objective.

Deletion of the U.S. Extra No. 1 Grade

NAPAR does not object to this change. The U.S. Extra No. 1 Grade is no longer utilized by the industry to any great degree.

Unclassified

Our members feel that “Unclassified” has been misunderstood by some in the industry, but that it serves a useful purpose in categorizing ungraded lots of potatoes. Unclassified should be retained and vigorously explained to the industry that it is not an actual grade designation.

Chef and Creamer Sizes

NAPAR is not opposed to the addition of Chef and Creamer sizes.

Section 51.1546

Our members are opposed to the proposed En Route or at Destination tolerances. They feel they will dilute the grade and result in lesser quality product in the marketplace. PACA already accommodates this situation with Good Delivery Standards that allow for damage en route or at destination.

Current Tolerance Levels

Current tolerance levels allow a total of not more than 8% including:

Internal Defects	5%
External Defects	5%
Soft Rot	1%

Good Delivery Standards allow the current standard to be boosted to:

Tolerance levels totaling not more than 12% at destination including:

Internal Defects	8%
External Defects	8%
Soft Rot	2%

Proposed Tolerance Levels

The proposed En Route or at Destination tolerance percentages would allow not more than 10% including:

Internal Defects	7%
External Defects	7%
Soft Rot	2%

Good Delivery Standards would allow the proposed standard to be increased to--
Tolerance levels totaling not more than 15% at destination including:

Internal Defects	11%
External Defects	11%
Soft Rot	4%

This comparison shows that when PACA's Good Delivery Standards are applied to the proposed En Route or at Destination tolerance levels, the tolerance percentages at destination are enlarged significantly. The result is a net increase of 3 percentage points each for Total Defects, Internal Defects, External Defects and 2 percentage points for Soft Rot. These increases are unwarranted and extremely **unfair to receivers**. This proposed change would clearly enable greater amounts of lower quality potatoes to qualify for the upper grades.

Section 51.1564 External Defects

NAPAR Members are dissatisfied with the proposed addition of specific scoring criteria. While the intent is to provide an objective means of evaluating defects, beyond "materially/seriously detracting from appearance of potato," the proposed changes are too lenient. These changes have the effect of diluting the grades as well. For example, a bruise is a bruise and pressure bruises and sunken discolored areas should not be treated differently than other bruises. Table IV should be eliminated and all bruises should be handled under the same set of rules.

Current scoring guidelines for external discoloration should remain in effect. The proposed criteria for external discoloration fall far short of defining the proper colorations and lack any color reference guide. The depth guide for growth cracks is too lenient and doesn't take into account how growth cracks can alter the shape as to materially detract from the form of the potato. Wholesale receivers and distributors have a great deal of difficulty trying to sell potatoes containing sprouts of 1/8" or longer. Individual or clusters of sprouts in excess of 1/8" should be scorable; allowing sprouts of up to 1/2" at destination is far too lenient for the U.S No. 1 Grade.

I hope these insights are helpful and please feel free to contact me directly if NAPAR can provide further assistance during this process.

Sincerely,



Patrick A. Davis
President

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