

November 20, 2006

Standardization Section
Fresh Products Branch, Fruit & Vegetable Programs
Agricultural Marketing Service
United States Department of Agriculture
Washington, D.C. 20250-0240

RE: Docket Number FV-06-303 Potatoes; Grade Standards

To Whom It May Concern:

These comments are being submitted on behalf of the Colorado Potato Administrative Committee, Area II. This organization represents 180 growers under state and federal Marketing Order 948 in the San Luis Valley of southern Colorado. We certainly appreciate the efforts put forth by the Agricultural Marketing Service to modernize and harmonize the potato standards.

The following comments reference Section 51.1564-

We are very supportive of the proposed changes regarding the development of en route destination tolerances for U.S. No. 1 and U.S. No. 2 grades. This change is important because it recognizes that potatoes are in fact a perishable commodity that may change once they are removed from the closely controlled and monitored storage environment they are maintained in for consumers benefit.

We support leaving the standard concerning sprouts unchanged. The current standard of damage when ten percent of the potatoes have sprouts more than 3/4 of an inch in length reflects a level of damage that the industry has identified as unacceptable and there is no need for differences between shipping point and destination to become a part of the standard. The industry currently spends hundreds of thousands of dollars to insure sprouting is controlled quite successfully therefore allowing shipping under the current standard without significant issues.

We support the efforts to use currently defined inspection instructions as objective means of evaluating external defects. We appreciate the need to include these scoring criteria as part of the standards.

We would like to see language developed that would allow different varieties to be shipped in the same package/container. One suggestion we would like to offer would be to have a definition similar to size definitions that would define mixed as more than one variety/type in a container. Therefore a package could be designated as U.S. # 1, mixed with mixed meaning more than one variety/type in a container. We do not want to see any equal weight or volume restriction as a requirement for this new standard. The market place is driving this need with the unique combinations of varieties and types they are requesting. We would prefer a standard that is as flexible as is what is reasonable and practical to the inspection process.

Sincerely,

Jim Ehrlich
Executive Director
Colorado Potato Administrative Committee