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Standardization Section - Fresh Products Branch
Fruit and Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agricultural
1400 Independence Ave SW.
Room 1661 South Building - Stop 0240
Washington, DC 20250-0240

November 15, 2006

RE: Federal Register / Vol. 71, No. 184/ Friday, September 22,2006 Page# 55356-55367
Potatoes; Grade Standards - Proposed Rule Change

To Whom It May Concern:

After serious consideration, we are opposed to the proposed rule change listed in the Federal Register. Gold Bell, Inc. is a family run business supplying potatoes, onions, and rutabagas to the New England markets. In business for over 40 years we have seen great changes in the produce industry. One change that most accurately represents today's marketing practices is the need for an INCREASE in quality standards. While revising tolerances, defining damage, and modifying guidelines can make our inspection process more consistent, any relaxing of current standards in order to harmonize Potato Grade Standards with Canada is a step in the wrong direction.

Current standards are lax to begin with. The end product user, the consumer is demanding even tighter standards. Supermarkets who provide the consumer have responded by creating their own protocols that are much tougher than current standards. Developing an en-route or destination tolerance that is 25% greater than shipping point allows more undesirable product to reach the marketplace. Typically it is this type of product that should not be shipped in the first place and would not be shipped under current standards. A better solution than decreasing quality at destination would be to increase quality at shipping point negating the need to ship and handle product that the consumer will ultimately reject.

While revising (not raising) current tolerances in all grades, defining damage and serious damage, updating, modifying, and revising guidelines to reflect current inspection instructions, and adding Chef and Creamer sizes all make the proposed standard more consistent and uniform with marketing trends; developing en-route or destination tolerances that are greater than current standards do not. If the purpose of these proposed standards is to facilitate the marketing of agricultural commodities, then the quality standards should be tightened at shipping point, not relaxed at destination. The proposed rule change as listed in the Federal Register should not be approved.

Thank you in advance for your time and consideration.

Sincerely,

Wayne Maggio
Operations