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Idaho Grower Shippers Association  
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November 15, 2006

Standardization Section  
Fresh Products Branch, Fruit and Vegetable Programs  
Agricultural Marketing Service  
United States Department of Agriculture  
1400 Independence Ave., SW, Room 1661 South Building  
Stop 0240  
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 Idaho Grower Shippers Association (IGSA). IGSA is a state wide trade association located in Idaho Falls, Idaho and represents all of the fresh pack potato shippers in Idaho.

Concerning the proposed grade standards published in the September 22, 2006 Federal Register, we offer the following comments.

#### 1. Section 51. 1564 External Defects

- a. AIR CRACKS - We agree with the proposed standard.
- b. BRUISES - For the most part it appears there is a conscious effort to take all references to "appearance" out of the scoring guide. Therefore, we believe "appearance" should be deleted as a scoring guide on this defect, and specific scoring criteria (i.e. 5% surface area) used. This would provide an objective means of evaluating the defect and would avoid the subjectivity of opinion.
- c. CUTS - We agree with the proposed standard.
- d. ELEPHANT HIDE - We would suggest an appropriate visual aid be developed for defect identity. A visual aid would allow effective visual comparison of the sample and the standard.
- e. EXTERNAL DISCOLORATION - The proposed rule is subjective based upon personal opinion of what light tan or light brown might be. Therefore, we recommend the use of Pot-L-1, Photo III as a guide to Light Tan and Pot-L-1, Photo 109 as a guide for Light Brown.
- f. FLATTENED OR DESPRESSED AREAS/PRESSURE BRUISES - We agree with the proposed standard.
- g. FLEA BEATLE INJURY - We support the proposed standard, but would suggest that it conflicts with the written description in Table III, External Defects. Language in Table III should be identical to the language in the Standard.

- h. GREENING - We agree with the proposed standard.
- i. GROWTH CRACKS - We agree with the proposed standard.
- j. GRUB DAMAGE - We agree with the proposed standard. However, we note that in Table III the criteria for "Damage" and "Serious Damage" utilize the same measurement to determine two different damage levels. Both utilize the 3/4 inch on 2-1/2 inch or 6 ounce potato. We recommend 1 inch on 2-1/2 inch or 6 once potato as an indicator of serious damage.
- k. NEMATODE (ROOT KNOT) - We agree with the proposed change.
- l. RHIZOCTONIA (BLACK SCURF) - We agree with the proposed standard.
- m. RODENT AND BIRD DAMAGE - We agree with this standard but observe that it has the same problem as the Grub Damage issue. We recommend 1 inch on 2 1/2 inch or 6 once potato as the standard for serious damage.
- n. RUSSETING - We agree with the proposed standard.
- o. SCAB-PITTED - We agree with the proposed standard.
- p. SCAB - We support the proposed standard.
- q. SILVER SCURF - We agree with the proposed standard, but suggest the threshold be set at 55 percent rather than the 50 percent proposed.
- r. SPROUTS - We support leaving the criteria for sprouting as currently written in the USDA Standards dated March 27, 1991. The existence of a % inch sprout constitutes a level of damage unacceptable to the industry at all levels.
- s. SUNKEN AND DISCOLORED AREAS - We agree with the proposed rule.
- t. SURFACE CRACKS - We agree with the proposed rule.
- u. WIREWORM OR GRASS DAMAGE - We agree with the proposed rule. It is a very good change.

2. INTERNAL BLACK SPOT - We agree with the proposed rule. We ask for comments to be open on color chip POT-CC-2. What other color chips were considered? It is difficult for the industry to make a reasonable comment on the chip itself when there are no alternatives. What other visual aid chips were used to select chip POT-CC-2. The numbering suggest there must have been at least one other chip.

In addition we offer the following comments.

1. The industry fully supports the proposed addition of a destination tolerance to the U.S. Standards for Grades of Potatoes. This support is based upon the fact it brings the U.S. Potato Standards in line with other flesh commodities that have had destination tolerances in place for many years.
2. The new standard is silent regarding a time period for "timely inspection" of product at destination. According to PACA rules, if a load is subject to re-inspection at destination, the inspection must be called for within 8 hours for trucks and with 24 hours for rail cars. Consideration of a "timely inspection" rule should be included in the standard matching the PACA rule.

Respectfully submitted,

Idaho Grower Shippers Association

David A. Smith

President