



March 27, 2008

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

Re: Docket No. AMS-FV-07-0140
United States Standards for Grades of Table Grapes (European or Vinifera Type)

Dear Sir/Madam:

The Asociación de Exportadores de Chile A.G. (ASOEX) appreciates the opportunity to submit comments on the proposed rule which would revise the subject Standards for Grades by adding a 5 percent allowance for shattered berries in consumer containers for shipment that are en route or at destination.

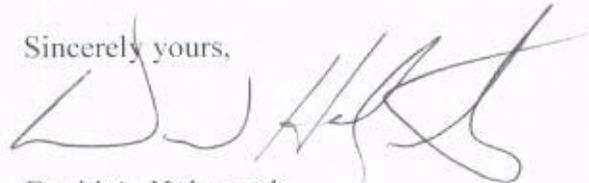
ASOEX is the largest national trade association for fresh fruit producers and exporters in Chile. ASOEX's membership accounts for more than half of the production exported from Chile to over 90 countries in the world including the United States, and approximately 90 percent by volume of fresh fruit exports to the U.S. In the last shipping season, September 2006 through August 2007, Exports to the U.S. market totaled 937,043 tons, of which table grapes accounted for 463,821 tons or 49.5%.

ASOEX believes that the amount of shattered berries is no longer an important consideration for the retailer or consumer of table grapes. The grape shatter was, at one time, important because loose berries accounted for shrinkage in product, or lessening sales revenue, and also contributing to in-store slip and fall accidents. Because all table grapes are now marketed in plastic net bags or clamshells, shattered berries no longer cause shrinkage and no longer cause hazardous conditions in stores.

ASOEX also understands that research on consumer preferences reveals that the consumers do not consider shatter to be a defect until it reaches 30% or more of the bunch. Less than 5% of consumers even express an opinion about grapes loose from the bunch, and above 1% actually like grapes that are already off the stems are easy to eat. ASOEX is aware that some retailers also package Loose grapes in clamshells and sell them like blueberries.

ASOEX urges that the shatter allowance be excluded entirely from the grading standards for table grapes, since it is no longer relevant as discussed above. If it is not excluded entirely, then the same shatter allowance should apply equally at point of shipment and at destination.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'D. Holzworth', written over a horizontal line.

David A. Holzworth
General Counsel for ASOEX