Administrator
Agricultural Marketing Service
USDA Mail Stop 0201
1400 Independence Ave. SW
Washington, DC 20250-0201

RECEIVED 4/24/03

Thursday, April 24, 2003

Dear USDA,

The Raisin Administrative Committee is proposing to add to their authority a new rule called production management program. I would like to object to paragraph 6, What are the expected effects on small businesses. They state overhead expenses of $212 per acre. This has no effect on the gross profit of producing raisins which is what this proposal intends to manage. Besides this only applies to large corporate growers. Their proposal is to take out of production the same percentage of acres from every farmer. This is inequitable. The percentage increase of gross income of a lower producing vineyard is actually higher than the larger vineyards. This plan is so obfuscated that the lower production units would actually benefit more under this program than under a normal production year and the upper end units would get barely any benefit at all. Under this plan it would be mandatory to participate. The plan calls for an alternative. The alternative calls for a farmer to produce his entire crop and basically disc a percentage under. This is so draconian that any farmer with one eye and half brain could see it would be foolish to choose and therefore is no alternative. I propose that the formula used in this plan should equalize the percentage change in gross profit.

Harlow S Dawson
690 E Bullard #104
Fresno, Ca 93710
559-449-8268
FAX 559-449-8269