

Lydia E. Berry  
Processed Products Branch  
AMS Fruit and Vegetable Programs  
USDA Stop 0247  
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Washington, DC 20250-0247

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Dear Ms. Berry:

As a shipper-packer representing 25+ apple growers in our area I wanted to contact you concerning the new grade standard proposed for apple juice from concentrate. I am strongly opposed to a new standard for single strength apple juice made from apple juice concentrate. I see no indication that such a standard would do anything to improve the marketing of apple juice or be of any particular benefit to consumers.

Our domestic producers and apple processors as well are struggling to compete in the global marketplace and are already at an extreme competitive disadvantage when it comes to juice produced with foreign concentrate. It is my understanding that this proposed standard could lead to a change in the requirement for 100% domestic ingredients for USDA commodity purchase programs. Such a change would brutalize our domestic producers and lead to a further erosion of our acreage in the U.S.

One of the goals of the USDA should be to help domestic agriculture compete in the global marketplace. Single strength juice is recognized as having an established trading value. Your proposed new grade standard attempts to fix something that isn't broken. It is my hope that the USDA will act responsibly and kill this proposed new grade standard.

Sincerely,  
H. Lee Showalter  
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