

January 15, 2002



Ms. Lydia E. Berry
Processed Products Branch
AMS Fruit and Vegetable Programs
USDA Stop 0247
1400 Independence Ave., SW
Washington, DC 20250-0247

TREE TOP, INC.

220 East Second Ave.
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Selah, WA
98942-0248

RE: New Grade Standard Proposed for Apple Juice From Concentrate

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Ms. Berry:

This letter is written on behalf of Tree Top, Inc., a grower-owned fruit processing cooperative headquartered in Selah, Washington. Our processed products include apple sauce, apple juice, apple juice concentrate, sliced apples and dehydrated apples.

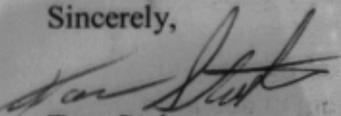
Tree Top, Inc. is opposed to the establishment of USDA Grade Standards for apple juice from concentrate for the following reasons:

- 1) This new grade standard for apple juice from concentrate might eventually lead to a change in the requirement for 100% domestic ingredients for USDA commodity purchase programs. This would negatively impact domestic growers.
- 2) Without the requirement to note the grade of apple juice on the label of packages sold to consumers, establishment of grade standards will not

“... provide a common language for trade, a means of measuring value in the marketing of apple juice from concentrate, and guidance in the effective use of apple juice concentrate.”

In order to accomplish the objectives as stated above, the USDA should instead establish grade standards on the apple juice concentrate and require that all apple juice concentrate sold into or within the United States be so labeled.

Sincerely,


Tom Stokes
CHIEF EXECUTIVE OFFICER

TPS/dlr