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We are independent pork producers and are involved in a niche market of a differentiated product. We are supporters of USDA's certification and verification programs and have witnessed firsthand their benefits to certain producers and production systems.

We must voice our objection, however to the inclusion of "Breed Claims" in the proposed uniform standards. Proposing to let **Breed Associations** determine the parameters for each separate breed, we feel, will result in vast ranges (or lack there of) of standards and confusion among end users. This could also allow Breed Associations (who are directed by individual breeders) with unscrupulous agendas that may differ from the majority of their breeders, to enact unrealistic taxes and fees on their members to gain the association's "blessing".

To the best of our knowledge all current Japanese customers have been relying on a DNA test for purebred Berkshire verification. This is an accepted and proven scientific testing protocol, and should be utilized.

These comments are intended to respond to the AMS proposed standards for certification, Docket No. LS-02-02.

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