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PEANUT SHELLERS ASSOCIATION
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August 22, 2003

Docket Clerk
Marketing Order Administration Branch
Fruit and Vegetable Programs
AMS, USDA
1400 Independence Avenue, SW
STOP 0237
Washington, DC 20250-0237

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RE: Docket No. FV03-996-2 IFR

Dear Sir or Madam:

The American Peanut Shellers Association is an association of commercial peanut shellers in the United States. Our members handle approximately 85% of the peanuts used in the United States for edible purposes and approximately 90% of the peanuts exported from the United States for edible purposes.

This comment is intended to support most of the action taken in the reference docket number. Our association strongly supports the changes made to the regulations concerning small kernel uses, appeal procedures, re-inspection of blanched lots and the increase in sound, whole kernel tolerance, as well as the effective time of the regulation.

We would urge the Secretary to make some change effective now to allow handlers to purchase high moisture peanuts.

The proposal indicates that there is some concern about the practical ability to efficiently grade peanuts with a moisture content higher than 16-18%.

While our association supported the Standards Board recommendation of allowing handlers to acquire farmers stock peanuts with a moisture content up to 25%, we understand the Department's concern. Therefore, we would urge the Secretary to increase the moisture level at this time from 10.49% to 16%. Further study can then be performed as to whether or not an even higher moisture level would be appropriate. We

believe that even this lower percentage will allow growers to harvest their peanuts quicker, thereby being less vulnerable to poor weather at harvest. Further, it should begin

to encourage development of new machinery and procedures that will reduce costs and increase efficiency. Raising the moisture level to only 16% should eliminate the current concern about grading efficiency.

Very truly yours,

John T. Powell

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