



May 10, 2005

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Mr. David L. Priester
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Standardization Section
Fresh Products Branch
Fruit & Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Room 1661 South Building, Stop 0240
Washington, DC 20250-0240

Dear Mr. Priester:

Re: United States Standards for Grades of **Snap Beans**
Docket #FV-05-302

The North American Perishable Agricultural Receivers (NAPAR) is a national trade association located in Washington, DC, representing independent produce wholesale receivers. NAPAR members are predominantly small businesses with combined annual sales in excess of \$4 billion. NAPAR formed an operating alliance with the Food Marketing Institute in 1999, enabling it to function independently while expanding the services to its members.

On behalf of our members, I appreciate the opportunity to submit comments to USDA and hope our perspective is helpful in determining the need to proceed with a revision to the U.S. Grade Standard for snap beans. NAPAR surveyed its members, soliciting their input on the probable impact these changes would have on their business operations.

Tolerance Percentages:

In reviewing comments from those who responded, it became clear that our members prefer that USDA continue to allow tolerance percentages for Snap Beans to be determined by weight and not by count. The prospect of a count-based tolerance percentage system raises questions involving potential accuracy of the inspections.

If a 100-count sample were to be taken, we would be curious as to how foreign material (stems, leaves and debris) and broken beans would be accounted for in the

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sample. Would broken beans be counted as whole or partial beans? In the current weight-based tolerance percentage system, these exceptions are easily accounted for by weight. Beans are generally sold at retail by weight in consumer units, not by count. While the prospect of switching to a weight-based system may speed up inspections, the current count-based system provides more accurate results at the inspection level.

I hope these insights are helpful. Please feel free to contact me directly if NAPAR can provide further assistance during this process.

Sincerely,

A handwritten signature in cursive script, appearing to read "Patrick A. Davis".

Patrick A. Davis
President