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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
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Dear Ms. Emery:

Re: United States Standards for Grades of Cantaloupes Docket # AMS-FV-2006-0205; FV-06-317 Federal Register, Vol. 71, No. 249, 12/28/06, pages 78128-78129

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. NAPAR surveyed its members, soliciting their input on the probable impact these changes would have on their business operations. Our members are in favor of the USDA, AMS proposal to revise the "Application of Tolerances" section in the U.S. Grade Standards by replacing the phrase "The contents of individual packages ***" with "Samples * * * " and revising "(a) Samples may contain * * *"

We hope that in situations involving 25-count samples, where individual packages contain 25 or fewer cantaloupes, the sample would consist of the entire package. In those cases where the package contains greater than 25 cantaloupes, such as bins, the sample should be taken from a variety of locations within the bin.

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

Sincerely,

Patrick A. Davis

President