



August 12, 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 Dewberries and Blackberries
Docket #FV-05-309**

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 Dewberries and Blackberries. NAPAR surveyed members, soliciting their input on the probable impact these changes would have on their business operations and found that members are opposed to the proposed change.

Color:

Our members oppose any attempt to change the color requirement to allow for a lesser amount of color and/or varying shades of color on the whole surface of the berry because it would only serve to dilute the quality of the grade. The surface color of a berry is a function of ripening and the ripening process stops once a berry has been picked. A Berry that is not "Well Colored," where the whole surface of the berry shall be a blue or black color, is not fully ripened, nor will it continue to ripen if it has already been picked.

David L. Priestler
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Therefore, the idea of allowing berries that have anything less than the “whole surface” fully colored would be allowing unripe berries into the U.S. No. 1 grade.

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 black ink, appearing to read "Patrick A. Davis". The signature is written in a cursive style with a large initial "P" and a long horizontal stroke at the end.

Patrick A. Davis
President