



September 22, 2006

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Cheri L. Emery
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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
Washington, DC 20250-0240

Dear Ms. Emery:

Re: United States Standards for Grades of **Parsley**
Docket # FV-06-314, Fed. Reg. Vol. 71, No. 141, 7/24/06, page 41755

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 if there is a need to proceed with a revision to the U.S. Grade Standard for Parsley.

NAPAR surveyed its members, soliciting their input on the probable impact these changes would have on their business operations and those who responded were very much in favor of the proposal to allow the percentages for tolerances, defects and the like to be determined by count and not weight. As for the unclassified category, some members requested that it be preserved, while others did not.

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

North American Perishable Agricultural Receivers
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United States Department of Agriculture

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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".

Patrick A. Davis
President

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