



May 23, 2007

Fax Transmission
(202) 720-8871
FPB.DocketClerk@usda.gov

Cheri L. Emery
Cheri.Emery@usda.gov
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 Sweet Cherries
Docket # AMS-FV-2007-0010; FV-06-302,
Fed. Reg. 3/309/07, Vol. 72, No. 61, page 15055

The North American Perishable Agricultural Receivers (NAPAR) is a national trade association located in Arlington, VA, 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 again submit comments on Sweet Cherries 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. Those members responding expressed several concerns about the viability of the proposal.

While the association is generally in favor of tightening up definitions as they pertain to sizes of fresh fruits and vegetables, we feel the proposed change would be improved if it established the proposed sizes as "minimum sizes" for their particular row size. For example, a sweet cherry of 62/64" would be considered an 11 Row Size, but one of 65/64" would be a 10 ½ Row Size. Use of a ring gauge would greatly assist inspectors in the field. Although the proposal doesn't address tolerances, we feel that a 5% tolerance for undersized and a 10% for oversized sweet cherries would be appropriate.

I hope these insights are helpful and 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