



December 22, 2004

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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 Sweet Potatoes  
Docket #FV-04-302  
Issued in the Federal Register/Vol. 69, No. 209/October 29, 2004/Page 63132

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 sweet potatoes. NAPAR surveyed its members, soliciting their input on the probable impact these changes would have on their business operations. In reviewing comments from those who responded, it became clear that our members supported the proposed addition of a new U.S./ No.1 Petite grade.

The U.S. No.1 Petite grade should be subject to the same requirements as the U.S. No.1 grade currently in the standard, except for the size requirement. Our members support the size requirement for the new U.S. No.1 grade as illustrated in the following size comparison chart.

**Size Comparison Chart:**

<u>Grade</u>	<u>Min. Diam.</u>	<u>Max. Diam.</u>	<u>Min. Length</u>	<u>Max. Length</u>
U.S. No.1 Petite	1½ inches	2¼ inches	3 inches	7 inches
U.S. No.1	1¾ inches	3½ inches	3 inches	9 inches

Our members believe that the establishment of this new U.S. No.1 Petite grade for sweet potatoes will aid in the marketing of smaller size sweet potatoes, improve the uniformity of delivered product, and enhance the relevance and effectiveness of USDA inspections.

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

Sincerely,



Patrick A. Davis  
President