



November 20, 2006

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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 Pineapples
Docket # FV-06-318, Fed. Reg. Vol. 71, No. 183, 09/21/06, page 55160

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 Pineapples.

NAPAR surveyed its members, soliciting their input on the probable impact these changes would have on their business operations. Members who responded were in favor of the USDA proposal to revise the tolerances by replacing Table I Shipping Point and Table II En Route or at Destination with numerical tolerances. Because the charts in Tables I and II are based on sliding scales, the numerical tolerances should be consistent with those of similar standards. We, therefore, suggest that USDA consider the tolerance percentages in the grade standards for Plumbs when deciding on the tolerance

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percentages for Pineapples. As with Plumbs, we suggest the following tolerance percentages would be appropriate for Pineapples:

	<u>Shipping Point</u>	<u>En Route or Destination</u>
Total Defects	8%	12%
Serious Damage	4%	6%
Permanent Defects		8%
Decay	½ of 1%	2%

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